

A.G. v. Northbrook Industries

<p style="text-align: right;">Page 14</p> <p>1 remember exactly.</p> <p>2 Q And that's fine. And you know, today is</p> <p>3 about what you remember. If you don't know, that's on</p> <p>4 okay answer. There's going to be times that I'll show</p> <p>5 you some documents and maybe that'll refresh your</p> <p>6 recollection. But I'm also not asking you to be a</p> <p>7 perfect historian. There's going to be a lot of times</p> <p>8 that I ask you to estimate, or what do you think. And</p> <p>9 so I just want you to know that you've raised your</p> <p>10 right hand and gone under oath, but I do understand</p> <p>11 that what we're talking about today occurred over five</p> <p>12 years ago. And that you only have a memory of it now.</p> <p>13 So just understand that I just want your best effort;</p> <p>14 okay?</p> <p>15 A Okay.</p> <p>16 Q Can you state your full name for the record?</p> <p>17 A A.G.</p> <p>18 Q And is it X-X-X?</p> <p>19 A Yes, sir.</p> <p>20 Q Have you ever been known by another name</p> <p>21 Ms. A.G.?</p> <p>22 A No, sir.</p> <p>23 Q What's your date of birth?</p> <p>24 A 8/28/99.</p> <p>25 Q Where were you born?</p>	<p style="text-align: right;">Page 16</p> <p>1 parties and stuff at my house. And she was kind of</p> <p>2 staying with me. We were staying together in my</p> <p>3 apartment and hanging out just about every day.</p> <p>4 Q So had she moved in with you end of May,</p> <p>5 beginning of June 2017?</p> <p>6 A Yeah, I wouldn't say she really moved in</p> <p>7 with me, you know, she still had her own house that</p> <p>8 she would -- where her mom lived that she would go</p> <p>9 back to here and there. But we were just together a</p> <p>10 lot and at my apartment.</p> <p>11 Q Okay. What's your current address.</p> <p>12 A It is 900 South Broad Street in Commerce.</p> <p>13 Q And who did you live with?</p> <p>14 A My mom and my son.</p> <p>15 Q What's your mom's name?</p> <p>16 A Tracy Griffin.</p> <p>17 Q And how old is your son?</p> <p>18 A Two. He'll be three this month.</p> <p>19 Q So Christmas birthday?</p> <p>20 A Yes, Christmas Eve birthday.</p> <p>21 Q Don't think that I'm creeping on you too</p> <p>22 much. G.W. told me that yesterday.</p> <p>23 A That's okay.</p> <p>24 Q I do have to admit that. So he'll turn</p> <p>25 three December 24th?</p>
<p style="text-align: right;">Page 15</p> <p>1 A In Atlanta.</p> <p>2 Q When did you move to Commerce?</p> <p>3 A Probably couple months after I was born.</p> <p>4 Q So you were born and raised in -- or you</p> <p>5 were raised in Commerce?</p> <p>6 A I was raised in Commerce.</p> <p>7 Q Okay. How long have you known G.W.?</p> <p>8 A We met in the eighth grade.</p> <p>9 Q Back in that, you know, 2000s -- I guess you</p> <p>10 were a high school senior in 2016?</p> <p>11 A Mm-hmm. Yes, sir.</p> <p>12 Q That's all right. It'll happen. Did you</p> <p>13 consider G.W. was your best friend?</p> <p>14 A More of like an acquaintance at the time</p> <p>15 during high school. We got more close after high</p> <p>16 school. I had another best friend during high school,</p> <p>17 but we just became really close after we graduated.</p> <p>18 Q Okay. And what high school did y'all go to?</p> <p>19 A Commerce.</p> <p>20 Q And you would have graduated in May of 2017?</p> <p>21 A Yes, sir.</p> <p>22 Q So tell me how did that kind of happen? You</p> <p>23 and G.W. becoming close after you graduated in May of</p> <p>24 2017?</p> <p>25 A We just hung out, like we had little house</p>	<p style="text-align: right;">Page 17</p> <p>1 A Yes.</p> <p>2 Q So he was born on 12/24/2019?</p> <p>3 A Yes, sir.</p> <p>4 Q Okay. And I don't need to know his name,</p> <p>5 but what is the son's father's name?</p> <p>6 A Gregory Cannon.</p> <p>7 Q And you do not live with him?</p> <p>8 A No.</p> <p>9 Q Are you in a relationship with him?</p> <p>10 A No.</p> <p>11 Q Where does he live?</p> <p>12 A He is actually in prison right now.</p> <p>13 Q For what?</p> <p>14 A He is in there for, like, violation of</p> <p>15 probation. They're making him serve out the rest of</p> <p>16 his probation. He had caught another charge. He has</p> <p>17 been -- it's about to be two years since he got locked</p> <p>18 up, but he should be getting out within May of next</p> <p>19 year.</p> <p>20 Q Okay. Where is he at in prison?</p> <p>21 A I'm not sure.</p> <p>22 Q Are y'all in communication at all?</p> <p>23 A We do talk.</p> <p>24 Q So, Ms. A.G., I don't want you think that</p> <p>25 I'm prying too much. So I want to give you a little</p>

A.G. v. Northbrook Industries

<p style="text-align: right;">Page 26</p> <p>1 Q And how long did you live with her?</p> <p>2 A I'd say about a year.</p> <p>3 Q Okay. What was your first job that you got</p> <p>4 after you stopped going to Georgia Gwinnett?</p> <p>5 A I think that it was Ryan's.</p> <p>6 Q The steakhouse?</p> <p>7 A Mm-hmm. The buffet place.</p> <p>8 Q And that was a yes?</p> <p>9 A Yes.</p> <p>10 Q Thank you. Lost my train of thought. Okay.</p> <p>11 Do you have any prior criminal history?</p> <p>12 A I got arrested one time for shoplifting.</p> <p>13 Q Where was that at?</p> <p>14 A Mall of Georgia.</p> <p>15 Q Do you remember what year it was?</p> <p>16 A I think it might have been 2018, February of</p> <p>17 2018.</p> <p>18 Q So you would have been 18 years old at that</p> <p>19 time?</p> <p>20 A Yes.</p> <p>21 Q Okay. What ended up happening with that</p> <p>22 charge?</p> <p>23 A I ended up having to do probation, and pay a</p> <p>24 fine, and community service. And it got taken off my</p> <p>25 record.</p>	<p style="text-align: right;">Page 28</p> <p>1 Q Back in June and July of 2017, what was your</p> <p>2 social media presence?</p> <p>3 A I would say I was on social media pretty</p> <p>4 often.</p> <p>5 Q That's a really poor question. Which social</p> <p>6 media applications did you use?</p> <p>7 A Snapchat, Instagram, maybe a little of</p> <p>8 Facebook.</p> <p>9 Q And moving to as we sit here today, what</p> <p>10 social media accounts do you have?</p> <p>11 A Snapchat, Instagram, Facebook, Twitter.</p> <p>12 Q TikTok?</p> <p>13 A TikTok, yes.</p> <p>14 Q That's when I know I've gotten old is when I</p> <p>15 don't have a social media account that I'm hearing</p> <p>16 about.</p> <p>17 Back in June and July of 2017, Ms. A.G.,</p> <p>18 during this time that you alleged you were being</p> <p>19 trafficked at the United Inn & Suites, would you and</p> <p>20 G.W. take Snapchats?</p> <p>21 A Yes.</p> <p>22 Q And my understanding as of yesterday is that</p> <p>23 Snapchat has a mechanism is what I'll call it called</p> <p>24 Snapchat memories. Where it can show things, videos,</p> <p>25 pictures that you were Snapchating in the past. Are</p>
<p style="text-align: right;">Page 27</p> <p>1 Q Any other criminal charges?</p> <p>2 A No, sir.</p> <p>3 Q Did you hire an attorney for that?</p> <p>4 A No.</p> <p>5 Q Other than that issue and this current</p> <p>6 lawsuit, have you ever been involved any other</p> <p>7 lawsuits?</p> <p>8 A No, sir.</p> <p>9 Q Have you ever filed for bankruptcy?</p> <p>10 A No.</p> <p>11 Q Do you have any legal experience or</p> <p>12 training, like paralegal training, anything like that?</p> <p>13 A No.</p> <p>14 Q Do you know if anyone in your family does?</p> <p>15 A No.</p> <p>16 Q Do you have any medical experience or</p> <p>17 training?</p> <p>18 A No.</p> <p>19 Q Does anyone in your family have any medical</p> <p>20 experience or training?</p> <p>21 A My mom worked in the medical field for a</p> <p>22 little while when I was younger. She was -- she did</p> <p>23 like ultrasound tech and phlebotomy.</p> <p>24 Q Did you know G.W.'s mother?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 29</p> <p>1 you familiar with that?</p> <p>2 A Yes.</p> <p>3 Q Now, G.W. apparently used that mechanism and</p> <p>4 was able to produce for us and we'll go over them</p> <p>5 later on, but a bunch of pictures and videos that she</p> <p>6 says were from June and July of 2017, so my question</p> <p>7 for you is would you have videos and pictures from</p> <p>8 June and July of 2017 on Snapchat memories?</p> <p>9 A I think I may have like one or two pictures</p> <p>10 but a lot of it is not on there anymore, I don't know</p> <p>11 how I still -- just from that time because there's</p> <p>12 like a period missing in my Snapchat memories and</p> <p>13 there's just like two pictures and that's it.</p> <p>14 Q Do you know what the two pictures of are</p> <p>15 from?</p> <p>16 A They're in the hotel room, there's like one</p> <p>17 of me sitting on the bed and then there's one of me</p> <p>18 and G.W. naked sitting on the bed.</p> <p>19 Q Okay. And -- is it the same hotel room?</p> <p>20 A Yes.</p> <p>21 Q And where is that hotel room at?</p> <p>22 A United Inn on Memorial Drive.</p> <p>23 Q And just -- anytime we talk about United Inn</p> <p>24 today, United Inn & Suites, it'll be understood it's</p> <p>25 the one off Memorial Drive; okay?</p>

A.G. v. Northbrook Industries

<p style="text-align: right;">Page 46</p> <p>1 she would -- she would just tell us "We'll talk to him 2 when we get there." She wasn't giving exact 3 information of why we were going there or where we 4 were going. We didn't even know where we were going. 5 Q And where did she pick you up from? 6 A My house, 10 B Wilson Road. 7 Q Were you with G.W.? 8 A Yes. 9 Q And then where did y'all go? 10 A Then we went to the hotel, we went to a 11 different hotel the first night off of Fulton 12 Industrial. 13 Q Is that a Red Roof Inn? 14 A I think so, but I'm not sure. 15 Q And again, Ms. A.G., I'm not asking you to 16 be a perfect historian here, but do you know about 17 what time of day y'all got to this hotel on Fulton 18 Industrial? 19 A I would say it was probably ten o'clock at 20 night. 21 Q Okay. So when y'all got there, it was 22 nighttime? 23 A It was nighttime. 24 Q Okay. So take me from there, y'all pull 25 into the parking lot of whatever hotel in Fulton</p>	<p style="text-align: right;">Page 48</p> <p>1 floor. 2 Q Did you have to walk by the lobby to get 3 into the room? 4 A Yes, because she was parked right in front 5 of the lobby and we just got out of the car and the 6 room was right beside the office, if not one door, two 7 doors down. 8 Q And did y'all like pack a overnight bag or 9 something? 10 A Yes. 11 Q And so Kiki gets the room for y'all and then 12 she leaves? 13 A Yes. 14 Q So y'all are stuck at a hotel off Fulton 15 Industrial with no vehicle; correct? 16 A Yes. 17 Q And either you or G.W. calls P.D., says, 18 what do we do. He says, y'all go walk the streets? 19 A Yes. 20 Q Okay. Take me from there. What did you go 21 do? 22 A So we went and walked around, we didn't 23 really know at the time, like, what we were walking 24 around for. And then we call him and we're like, 25 we're not sure what we're really supposed to be doing.</p>
<p style="text-align: right;">Page 47</p> <p>1 Industrial. What happens next? 2 A And she goes in -- well, we had to give her 3 money. I'm not exactly sure how much. But we had to 4 pay -- 'cause he told us we needed to bring so much 5 money. And so we gave it to her. And she used it and 6 went inside and booked a hotel room. And then she 7 came back out and she told us to just go into the 8 hotel room and to call P Diddy. And then we called 9 him, and he told us -- basically all he said was, go 10 walk the streets and make money. That was all he 11 said. 12 Q Did P.D. give you a reason as to why you had 13 to give money to go work for -- with him? 14 A No. He just told us that we needed this 15 much money when we got down there. He didn't say 16 exactly why. 17 Q And you believe Kiki took that money to book 18 a room in this hotel off Fulton Industrial? 19 A Yes. 20 Q Did you or G.W. go into the is lobby with 21 Kiki to book that room? 22 A No. 23 Q Do you remember where the room was in the 24 hotel? 25 A It was right by the office. On the bottom</p>	<p style="text-align: right;">Page 49</p> <p>1 Can you tell us? And he was like, just talk to 2 people. And then that's whenever he told us, he was 3 like, I'm around, I'll be watching y'all. 4 And so then we kept walking a little more 5 and we probably had a couple people stop and talk to 6 us. But at the time, we didn't know that he was 7 wanting us to have sex. And when people were asking 8 for that, we were like, no, that's not what we're 9 doing. 10 And so then we talked on the phone with him 11 again and he was telling us, like, you need to ask 12 them what they want and then give them a price. And 13 then we -- that's whenever we had texted him and was 14 like, if you want us to make money, you have to tell 15 us what to do because we still were confused as to 16 what was going on. 'Cause like I said, we thought 17 that we were giving out dances. Like, we thought he 18 was going to set up a private dance with somebody that 19 he knew. 20 And so then that's when he told us that we 21 were basically going to be -- that's when we finally 22 realized we were going to be fucking for money. And 23 that night, we only had -- we walked up to -- there 24 was a truck stop at the end of the road that we had 25 went to and we had met these two guys. And we had</p>

A.G. v. Northbrook Industries

<p style="text-align: right;">Page 54</p> <p>1 Q And what I actually want to ask you about 2 really occurred on June 21st. So you see if you go 3 down to this second message, it starts with, "Can I 4 buy a .5?" Do you see where I'm talking about? 5 A Yeah. 6 Q All right. And so this is a text from your 7 number to somebody named Qua, Q-U-A. It says June 8 22nd, 2:35 UTC. That's actually 9:35 p.m. on June 21, 9 2017. Who is Qua? 10 A His name's Qua. He's just a guy that I knew 11 from high school. 12 Q Okay. So a friend from Commerce? 13 A Yes. 14 Q And are these text messages you trying to 15 get marijuana from him? 16 A Yes. 17 Q Did you recreationally smoke marijuana in 18 June and July of 2017? 19 A Occasionally, yes. 20 Q I saw last night when I was going over some 21 documents that your attorneys produced reference to 22 beans which I believe are some form of ecstasy. My 23 question is in June and July of 2017 other than 24 marijuana, did you consume any other drugs? 25 A No.</p>	<p style="text-align: right;">Page 56</p> <p>1 A Right. I know we come in and he asked how 2 the night went and everything. And we were like, I 3 mean, it was okay. It was -- that's what we said to 4 him at the time, you know. And then he asked for the 5 money that we made that night. And then he told 6 them -- he told us that we were going to go to a 7 different hotel. 8 And so we just got in the car, and we left. 9 And we went to Doc's house and picked him up. And we 10 were probably sitting in the parking lot there for 11 about an hour. But me and G.W. were kind of like 12 dozing to sleep because we had been up all night. And 13 then once they came back out to the car, we drove over 14 to the United Inn. 15 Q Who's Doc? 16 A I'm -- I guess he was one of P Diddy's 17 workers, friends. I'm not -- that's the only time I 18 met him. I'm not exactly sure who he was. 19 Q African American man? 20 A Yes. 21 Q How old do you think he was? 22 A He was probably at least in his 40s I would 23 have to say. Late 30s. 24 Q Do you remember where he lived? 25 A No.</p>
<p style="text-align: right;">Page 55</p> <p>1 Q Did you during June and July of 2017 drink 2 alcohol? 3 A Yes. 4 Q How would you get that alcohol? 5 A I mean, this guy right here is a little bit 6 older, he graduated a couple years before me 7 or -- yeah, before me. So people would just bring it. 8 Older -- probably like people that were 21. 9 Q Did you have a fake ID in June and July of 10 2017? 11 A No. 12 Q Was there ever a time that you and G.W. went 13 into a strip club? 14 A No. 15 Q Did you ever yourself check into a hotel in 16 June of 2017? 17 A No. 18 Q All right. So we left off where 19 mister -- or P.D. -- actually so P.D. picked you up on 20 the morning of June 23rd from that hotel at Fulton 21 Industrial? 22 A Yes. 23 Q And tell me about that. He comes in, what's 24 the first thing he says to you? Because this is the 25 first time y'all have met him; right?</p>	<p style="text-align: right;">Page 57</p> <p>1 Q And so y'all are in wherever he lives 2 parking lot for a little while. Then did Doc come 3 with you, G.W., and P.D. to the United Inn? 4 A Yes. 5 Q Who was driving? 6 A P Diddy. 7 Q And so y'all pull into the United Inn and 8 what happens next? 9 A So me and G.W. sit in the car and P Diddy 10 gets out and stands in front of the car. And him and 11 Doc have a conversation and then Doc goes to the front 12 office and gets a room. And then comes back and lets 13 us into the room. We all walk inside. Doc walks back 14 out. And then P Diddy tells us that we need to get 15 ready for the day. 16 Q Do you remember where y'all parked at United 17 Inn? 18 A It was like right in front of our room 19 because I just remember getting out of the car and 20 walking right into the room. 21 Q Do you remember what room y'all got? 22 A 112, I think. 23 Q And explain to me where just based on your 24 recollection and the hotel generally, where is room 25 112 of the United Inn?</p>

A.G. v. Northbrook Industries

<p style="text-align: right;">Page 58</p> <p>1 A So the office is in the middle and if you 2 walk out towards the road to the the lobby to your 3 left, it's on the left side. But if you're facing 4 towards the hotel, it's on your right side on the 5 bottom floor. Kind of closer to the office. 6 Q Okay. And there's two parking lots at the 7 United Inn; right? 8 A The one in the front and the one in the 9 back? 10 Q Yes, ma'am. 11 A Yes. 12 Q And so y'all are parked in the front parking 13 lot? 14 A Yes. 15 Q And so Doc went into the lobby by himself? 16 A Yes. 17 Q Did you ever go into the lobby with him? 18 A No. 19 Q And he returns, and he has a room key? 20 A Yes. 21 Q And so you and G.W. get out of the car and 22 y'all walk straight into room 112? 23 A Yes. 24 Q And then that's the last time you see Doc? 25 A Yes.</p>	<p style="text-align: right;">Page 60</p> <p>1 then we started walking around again after that. 2 Q Okay. 3 A But that first day, we -- we was walking up 4 and down the hill on Memorial more on the first day. 5 Q Okay. Were you wearing the same outfit on 6 that first day you're talking about when y'all were 7 walking Memorial as you had the night before on Fulton 8 Industrial? 9 A No. 10 Q What were you wearing at Fulton Industrial? 11 A A yellow dress. 12 Q And what kind of shoes if you remember? 13 A I don't remember. 14 Q Now, moving back to June 23rd, when y'all 15 were walking Memorial. What were you wearing that day 16 if you remember? 17 A I don't remember that first day what I had 18 on. 19 Q Do you remember if -- was it your clothes? 20 A Yes. 21 Q All right. So y'all are walking up and down 22 Memorial on June 23rd. Did you get any -- I'm just 23 going to call them customers. Did you get any 24 customers on that first night? 25 A During the daytime, no. But when it became</p>
<p style="text-align: right;">Page 59</p> <p>1 Q And does P.D. sit down with y'all in that 2 room and that's he says y'all need to get ready for 3 the day? 4 A Yeah, he stood in there, it -- it wasn't 5 long. It was probably five minutes if that and just 6 told us that we needed to get ready. And we told him 7 that we were tired. And he was like, you know, I 8 don't care. Y'all still have to walk around during 9 the day. And so then he just left with Doc. 10 Q Do you have any idea what time of day you 11 arrived at United Inn on June 23rd? 12 A I'm not sure exactly what time it was. I 13 know it was pretty early. 14 Q Okay. So does -- after P.D. says, y'all got 15 to get ready for the day, does he leave? 16 A Yes. 17 Q And take me from there. 18 A So then we get ready, we shower, we change 19 clothes, and get ready. And then we just go walking 20 around. We go Memorial Drive and go to the gas 21 station, I think. Because he gave us, like, \$20 to go 22 get something to eat. So we walk up the road and see 23 what's all on the street and get us something to eat 24 and some drinks. And then I think we went back to the 25 hotel to hang out for a minute and eat and chill and</p>	<p style="text-align: right;">Page 61</p> <p>1 nighttime, yes. 2 Q Okay. And tell me about the first customer 3 when it became nighttime. 4 A So we had -- we had met these guys up at the 5 gas station earlier. And they ended up coming down to 6 our room and -- they drove down there and came and met 7 us. 8 Q And where did you meet them earlier? 9 A At the gas station. 10 Q And at the gas station, did y'all tell them, 11 hey, we're staying at the United Inn, y'all should 12 come visit? 13 A Yes. 14 Q Was commercial sex discussed at the gas 15 station? 16 A No, it wasn't really blatantly said that's 17 what they wanted. It was just -- they had came up to 18 us first wanting to -- and asked where we were at and 19 what were we doing. And we were like, oh, we're just 20 down here at the United Inn if you want to come by. 21 And that's when they drove down to the hotel and then 22 we discussed it more when they got down there. 23 Q How many guys was it? 24 A Two. 25 Q Two? You don't know their names; do you?</p>

A.G. v. Northbrook Industries

<p style="text-align: right;">Page 62</p> <p>1 A No.</p> <p>2 Q What did they look like best you can</p> <p>3 remember?</p> <p>4 A African-American.</p> <p>5 Q Old, young?</p> <p>6 A Probably about 30s.</p> <p>7 Q All right. So and we're in nighttime now;</p> <p>8 correct?</p> <p>9 A Yes.</p> <p>10 Q So y'all walked back to the United Inn?</p> <p>11 A Mm-hmm.</p> <p>12 THE REPORTER: Yes?</p> <p>13 THE WITNESS: Yes.</p> <p>14 BY MR. STORY:</p> <p>15 Q And they show up -- did you give them your</p> <p>16 cell phone number?</p> <p>17 A I'm not sure. We might have because we did</p> <p>18 give people our number so they could contact us.</p> <p>19 Because -- I think that we did give them our number</p> <p>20 because they ended up coming back the next day with</p> <p>21 more people.</p> <p>22 Q Okay. So let's stay with June 23rd the</p> <p>23 first time. All right. So they show up and you said</p> <p>24 y'all start talking. And what's that conversation?</p> <p>25 A Whenever we get back to the hotel?</p>	<p style="text-align: right;">Page 64</p> <p>1 Q Do you remember what price you gave them?</p> <p>2 A No.</p> <p>3 Q And so do you proceed to have sex with one</p> <p>4 of the men? Both men?</p> <p>5 A One. And then -- yeah, so I was in the</p> <p>6 bedroom, and they went in the bathroom.</p> <p>7 Q How long do you think those men with in</p> <p>8 y'all's room?</p> <p>9 A Probably 30 minutes at the longest.</p> <p>10 Q Okay. And then do they leave?</p> <p>11 A Yes.</p> <p>12 Q All right. And staying on that night of</p> <p>13 June 23rd, I get that technically we could be in the</p> <p>14 early morning hours of June 24th, but just for our</p> <p>15 intents and purposes, we'll just call it the first</p> <p>16 night.</p> <p>17 A Mm-hmm.</p> <p>18 THE REPORTER: Yes?</p> <p>19 THE WITNESS: Yes. Yes.</p> <p>20 BY MR. STORY:</p> <p>21 Q It's fine. It's going to happen again.</p> <p>22 It's okay.</p> <p>23 All right. Tell me about was there a second</p> <p>24 customer on the first night?</p> <p>25 A There was three people total on that first</p>
<p style="text-align: right;">Page 63</p> <p>1 Q Yes, ma'am?</p> <p>2 A We asked them what they were looking for.</p> <p>3 That's how we would come about it. And I -- I think</p> <p>4 that they said that they were just looking to have</p> <p>5 fun. And that's all they said. And then they came in</p> <p>6 the room and -- 'cause this was all out in the parking</p> <p>7 lot when we were talking to them, we were standing</p> <p>8 outside of their car having this conversation. And</p> <p>9 then they come in the room and we just -- I think</p> <p>10 that's when we discussed a price and what they wanted.</p> <p>11 And they -- I think G.W. went with one of them and I</p> <p>12 went with one of them.</p> <p>13 Q Did y'all's room have one bed or two beds?</p> <p>14 A Two beds.</p> <p>15 Q So would each of y'all be in a bed?</p> <p>16 A I'm actually not sure about that.</p> <p>17 Q That's okay.</p> <p>18 A I can't remember if it was one king bed or</p> <p>19 if it was two beds.</p> <p>20 Q Okay. When y'all were talking at the car,</p> <p>21 front parking lot or back parking lot?</p> <p>22 A Front.</p> <p>23 Q And what was it that these guys said they</p> <p>24 wanted?</p> <p>25 A They said that they wanted sex.</p>	<p style="text-align: right;">Page 65</p> <p>1 night. So there was the two that were together and</p> <p>2 then there was one more later on or early in the</p> <p>3 morning.</p> <p>4 Q And where did you find him?</p> <p>5 A He came driving into the parking lot and was</p> <p>6 like riding around and then stopped and talked to us</p> <p>7 'cause we were just standing in the parking lot at the</p> <p>8 time.</p> <p>9 Q Front or back?</p> <p>10 A Front.</p> <p>11 Q And so he pulls up, y'all have a</p> <p>12 conversation, and does he park the car and come to</p> <p>13 your room?</p> <p>14 A Yes, but he parked around back.</p> <p>15 Q Did y'all tell him to park around back?</p> <p>16 A No.</p> <p>17 Q And you don't know this guy's name?</p> <p>18 A No.</p> <p>19 Q What did he look like?</p> <p>20 A I can't remember exactly what he looked</p> <p>21 like, but he had some type of like construction gear</p> <p>22 on, like that shiny construction gear. That's all I</p> <p>23 can remember about him.</p> <p>24 Q So he came into room 112, and what happened?</p> <p>25 A And then me and G.W. both had sex with him.</p>

A.G. v. Northbrook Industries

<p style="text-align: right;">Page 70</p> <p>1 A Yes.</p> <p>2 Q And I think we established this, but the 346</p> <p>3 number is the number from the phone that P.D. gave</p> <p>4 you?</p> <p>5 A Yes.</p> <p>6 Q Okay. You can go to page 736. Actually,</p> <p>7 you can go to 735. And I'm reading message 8753 which</p> <p>8 is from P.D. to Ms. A.G. June 24, 2017, at 6:12 p.m.</p> <p>9 Eastern. It states, "The only time you pass out your</p> <p>10 phone number is after you've already turned the trick</p> <p>11 with the john. Then you can give him the number.</p> <p>12 Nobody gets the number before they spend the money</p> <p>13 with you. Do you understand that??" End of message.</p> <p>14 Can you just briefly, Ms. A.G., explain what</p> <p>15 turning a trick with a john means?</p> <p>16 A I'm guessing having sex with money for one</p> <p>17 of the guys.</p> <p>18 Q And, Ms. A.G., I'm not trying to be</p> <p>19 difficult with you, but -- so this gets into a</p> <p>20 written -- you said that you guess. And really what I</p> <p>21 want to know is based on your understanding of dealing</p> <p>22 with P.D., did you understand when he said turn the</p> <p>23 trick with the john to mean having sex with someone</p> <p>24 for money?</p> <p>25 A Yes, I -- it's after -- after we already met</p>	<p style="text-align: right;">Page 72</p> <p>1 what you can remember about these three plays and</p> <p>2 already making over 400?</p> <p>3 A If it's -- 'cause I know on Saturday, we had</p> <p>4 a group of people. It was like five people. I don't</p> <p>5 know if, like, one of those plays would be that group.</p> <p>6 If I considered that just one. And then -- I can't</p> <p>7 really remember exactly who I'm talking about and how</p> <p>8 they happened that night.</p> <p>9 Q Outside of that message, and just talking</p> <p>10 about that Saturday, can you remember who the -- what</p> <p>11 customers you dealt with on that day specifically?</p> <p>12 A I know on that day --</p> <p>13 MR. BOUCHARD: Talking about June 25th,</p> <p>14 Saturday?</p> <p>15 MR. STORY: That -- June 24, 2017,</p> <p>16 which was a Saturday.</p> <p>17 MR. BOUCHARD: June 24th? Yep.</p> <p>18 MR. STORY: Yes.</p> <p>19 THE WITNESS: Saturday, as in that</p> <p>20 night on Saturday? Like before --</p> <p>21 BY MR. STORY:</p> <p>22 Q That's a very good question. I am talking</p> <p>23 about Saturday night, June 24th going into the early</p> <p>24 morning hours of June 25th which is a Sunday.</p> <p>25 A Okay. Okay.</p>
<p style="text-align: right;">Page 71</p> <p>1 whoever, I'm guessing john is like a john doe, like,</p> <p>2 something you don't know their name. And then after</p> <p>3 the trick, which is having sex, that's what you can</p> <p>4 give out your number.</p> <p>5 Q Okay. And if you'll flip the next page 734</p> <p>6 and start at -- I'm going to read it out loud for the</p> <p>7 record. But just so you can read along, I'm going to</p> <p>8 start at 8740 and work my way up.</p> <p>9 A Okay.</p> <p>10 Q And 8740 is a message from P.D. to Ms. A.G.</p> <p>11 It says June 25, 2017, at 4:07 a.m. that's really</p> <p>12 June 24, 2017, at 11:07 p.m. It states, "How you</p> <p>13 doing tonight?" Ms. A.G. replies, "We've made three</p> <p>14 plays and already made over 400." P.D. responds,</p> <p>15 "That's my girls." Ms. A.G. responds, "Yeah, but we</p> <p>16 had to sit in the hotel for a min 'cause something was</p> <p>17 happening outside the hotel." Then P.D. says, "Just</p> <p>18 don't miss too much \$\$. " End of message.</p> <p>19 So this is the night of June 24, 2017, which</p> <p>20 is a Saturday and we'd already gone over the first</p> <p>21 night where you had the group of two guys and then the</p> <p>22 construction worker. So we're second night just to</p> <p>23 give you context.</p> <p>24 A Okay.</p> <p>25 Q Tell me to the best of your recollection,</p>	<p style="text-align: right;">Page 73</p> <p>1 Q And just so -- because I want you to</p> <p>2 understand where we're at, the first night you stayed</p> <p>3 at the United Inn was June 23rd and that's when y'all</p> <p>4 walked Memorial. And so then -- and you've told me</p> <p>5 about that time. Then you wake up and now we're on</p> <p>6 Saturday, June 24th and we're talking about that night</p> <p>7 which would go into June 25th; okay?</p> <p>8 A Okay. Okay.</p> <p>9 Q So tell me the best you can what you</p> <p>10 remember about the customers on June 24th going into</p> <p>11 June 25th?</p> <p>12 A We had two groups of people. One was more</p> <p>13 of Hispanic guys and there was -- I'd say four or five</p> <p>14 of them. And then there was another group of guys.</p> <p>15 The two guys that I had told you about from Friday,</p> <p>16 they had texted us. I'm not sure if they texted</p> <p>17 us -- I -- I -- that's what I think is that they</p> <p>18 texted us and came back the next day. But I know for</p> <p>19 sure it was those guys, but I don't know exactly how</p> <p>20 they ended up back there. And they brought more</p> <p>21 people with them. And there was either four or five</p> <p>22 of them.</p> <p>23 Q And we'll talk about those two interactions</p> <p>24 in a second. Any other customers that you can recall</p> <p>25 on that Saturday night early Sunday morning June 24th</p>

A.G. v. Northbrook Industries

<p style="text-align: right;">Page 74</p> <p>1 and 25th of 2017?</p> <p>2 A Not any that I, like, remember. It could be</p> <p>3 possible there was other people that night, but</p> <p>4 because those two are the only things that really pop</p> <p>5 into my head from that night.</p> <p>6 Q Okay. Which one happened first in time if</p> <p>7 you remember? The Hispanic guys or the group from the</p> <p>8 two guys that you had met with Friday?</p> <p>9 A The Hispanic guys.</p> <p>10 Q Okay. How did you meet them?</p> <p>11 A We met them -- we were standing, like,</p> <p>12 outside on the sidewalk in front of the hotel. And</p> <p>13 they drove by, and they stopped to talk to us.</p> <p>14 Q When you say you were standing on the</p> <p>15 sidewalk, as in if you would have walked away from the</p> <p>16 hotel, would you have stepped onto Memorial Drive?</p> <p>17 A Yes.</p> <p>18 Q Okay. And so they were driving on Memorial</p> <p>19 Drive?</p> <p>20 A Yes. And we were standing in front of the</p> <p>21 hotel. And they pulled into the parking lot to talk</p> <p>22 to us. And so we walked over to them to talk to them.</p> <p>23 And they asked what we were doing out there. And we</p> <p>24 said, what are y'all looking for? And they said that</p> <p>25 they were looking for sex. And then we discussed a</p>	<p style="text-align: right;">Page 76</p> <p>1 Kleenex right there. Do you need -- is that your</p> <p>2 drink?</p> <p>3 A Mm-hmm.</p> <p>4 Q Okay. Take your time. It's not a race.</p> <p>5 A I just remember them coming in the room and</p> <p>6 it was just like they stood in a line and just kind</p> <p>7 of -- each one -- it was mostly just me that did stuff</p> <p>8 with them. It -- some of them got oral sex and some</p> <p>9 of them was just having sex. Can't think of --</p> <p>10 Q Did you have sexual intercourse with all of</p> <p>11 the guys in that group?</p> <p>12 A I am not sure if it was all of them. I</p> <p>13 think there were one or maybe two that it was just</p> <p>14 oral sex.</p> <p>15 Q Can you recall roughly how long they were in</p> <p>16 your room?</p> <p>17 A I would say it was not too long, but it was</p> <p>18 probably at least like 45 minutes.</p> <p>19 Q And what was G.W. doing?</p> <p>20 A She was kind of just like standing on the</p> <p>21 side of the bed -- on the other side of the bed. I</p> <p>22 was on one side of the bed; she was on the other side</p> <p>23 of the bed. And she was saying that she didn't want</p> <p>24 to mess with any of them, so she was just kind of</p> <p>25 sitting there.</p>
<p style="text-align: right;">Page 75</p> <p>1 price. I'm not sure how much. But I'm -- what had</p> <p>2 happened with them is we had discussed a price and</p> <p>3 they were not trying to pay what they said they were</p> <p>4 going to pay.</p> <p>5 Q Okay. And so did that -- when you say they</p> <p>6 were not paying what they said they were going to pay,</p> <p>7 when did that come up? Was that before or after the</p> <p>8 commercial sex had been performed?</p> <p>9 A That was after.</p> <p>10 Q About what time of day was this if you can</p> <p>11 remember?</p> <p>12 A I don't remember exactly what time.</p> <p>13 Q Was it nighttime outside?</p> <p>14 A It was at nighttime.</p> <p>15 Q Okay. And so y'all discuss a price, I know</p> <p>16 you don't remember it. Did they park in the front or</p> <p>17 in the back?</p> <p>18 A In the front.</p> <p>19 Q And then all four to five of those Hispanic</p> <p>20 guys go into room 112 where you and G.W. are?</p> <p>21 A Yes.</p> <p>22 Q Okay. And, you know, Ms. A.G., I'm sorry</p> <p>23 that I have to get into this, but it is what it is.</p> <p>24 What happens when those men come in? And take your</p> <p>25 time, we can take as many breaks as you need. You got</p>	<p style="text-align: right;">Page 77</p> <p>1 Q All right. So the -- all of it happens,</p> <p>2 they're in there for roughly 45 minutes. Then do they</p> <p>3 leave?</p> <p>4 A So then we told them they needed to pay, and</p> <p>5 they wasn't -- they were trying to pay less than what</p> <p>6 they had said they were going to pay originally. And</p> <p>7 so then that -- I think -- we had texted P Diddy and</p> <p>8 told him that they weren't trying to pay. And we</p> <p>9 kicked them out. G.W. told them that if they didn't</p> <p>10 get out, she was going to pepper spray them. So we</p> <p>11 pushed -- she pushed them out of the room.</p> <p>12 And when she pushed them out of the</p> <p>13 room -- she shut the door and they started banging on</p> <p>14 the door or like, probably like 15 to 20 minutes</p> <p>15 because one of the guys had left his shoes. I know</p> <p>16 for sure his shoes, but I think that there was</p> <p>17 something else. I don't know if it was his wallet or</p> <p>18 something. And so he wanted to get back in to get his</p> <p>19 stuff. And then we finally opened the door and handed</p> <p>20 them their stuff after like 15 minutes of them banging</p> <p>21 on the door. And then they left.</p> <p>22 Q In the room y'all are in that night, the</p> <p>23 door that goes in and out of that room, if you walked</p> <p>24 out of the room, would you be in the front parking lot</p> <p>25 of United Inn?</p>

A.G. v. Northbrook Industries

<p style="text-align: right;">Page 82</p> <p>1 finally got in the car and left.</p> <p>2 Q Do you remember what you were wearing on</p> <p>3 June 24, 2017? That Saturday night going into the</p> <p>4 morning of June 25th, Sunday?</p> <p>5 A I don't remember exactly what I was wearing,</p> <p>6 but I know I didn't have a lot of clothes on. Like</p> <p>7 little clothing covering my body.</p> <p>8 Q Was it your clothes?</p> <p>9 A Yes.</p> <p>10 Q Were you -- did P.D. or anybody associated</p> <p>11 with P.D. ever provide you clothes to wear?</p> <p>12 A No.</p> <p>13 Q If we could go back to the that exhibit.</p> <p>14 And I want to go to the front page of it. It's</p> <p>15 page 733. And I'm going to -- I'm going to read up</p> <p>16 from 8728 which I'm going to start with a message from</p> <p>17 Ms. A.G. to P.D., it's dated June 25, 2017, at 6:23</p> <p>18 a.m., really that would be June 25, 2017, at 1:23 a.m.</p> <p>19 It says, "Do you keep driving up and down?</p> <p>20 Are you the one that keeps passing us and waving?"</p> <p>21 P.D. responds, "No, I would never bring that kind of</p> <p>22 attention to myself." You respond back, "Well, there</p> <p>23 is a car that has drive past us like ten times and now</p> <p>24 it is parked watching us." P.D. says, "Keep a eye on</p> <p>25 him. Could be some bullshit or he could be jacking</p>	<p style="text-align: right;">Page 84</p> <p>1 It states, "When you coming to get the</p> <p>2 money?" P.D. responds, "How much is it?" You respond</p> <p>3 back, "Over five." P.D. says, "Take \$2 to go to the</p> <p>4 store and get some blunts." You say, "Okay." And</p> <p>5 then you send another message, it says, "I couldn't</p> <p>6 get them across the street. And the other one is all</p> <p>7 the way at the top of the hill." And then we'll flip</p> <p>8 over the page 731, P.D. says to you, "I don't worry</p> <p>9 about, I will get them." He then sends another</p> <p>10 message two minutes later to you, "Y'all go ahead and</p> <p>11 clock out. I will get them." And then an hour later</p> <p>12 at 3:56 a.m. Eastern Time, he says to you, "Delete all</p> <p>13 texts from you and I now."</p> <p>14 So it sounds like to me, if P.D. told you to</p> <p>15 clock out, did that mean based on your understanding</p> <p>16 that y'all did not have to go solicit yourselves</p> <p>17 anymore?</p> <p>18 A Yes.</p> <p>19 Q Okay. And so that would have been about</p> <p>20 3:00 a.m. on that Sunday, June 25th. Why did P.D.</p> <p>21 want you to delete all the texts from him?</p> <p>22 A I'm not sure. I guess just to keep himself</p> <p>23 safe in case something happened.</p> <p>24 Q Did you know anything about his criminal</p> <p>25 history at this time?</p>
<p style="text-align: right;">Page 83</p> <p>1 his D**K! Just keep working." You respond, "Okay,</p> <p>2 daddy." End of message.</p> <p>3 So this is -- I know that it's on Sunday,</p> <p>4 but really what we've been talking about this night to</p> <p>5 Saturday night. Do you -- did anything come of this?</p> <p>6 In reading these messages, do you remember that</p> <p>7 happening?</p> <p>8 A I do remember that happening, but I don't</p> <p>9 think anything happened past the person driving by.</p> <p>10 Q Okay. I'm going to hand you what I'm</p> <p>11 marking as Defendant's Exhibit 4. And again, these</p> <p>12 are cell phone records from P.D. or Zaccheus Obie that</p> <p>13 were obtained by the FBI in the criminal</p> <p>14 investigation.</p> <p>15 (Defendant's Exhibit 4 was marked for</p> <p>16 identification.)</p> <p>17 MR. STORY: And for the record, the</p> <p>18 pages from the FBI are 731 and 732.</p> <p>19 BY MR. STORY:</p> <p>20 Q And, Ms. A.G., again if we can start on the</p> <p>21 last page. And I want to start with message 8711 and</p> <p>22 it's from P.D. to you June 25, 2017, at 7:35 a.m.</p> <p>23 Excuse me -- I'm going to start at 8713 which is a</p> <p>24 message from you to P.D. June 25, 2017, with the time</p> <p>25 change, it's at 2:34 in the morning.</p>	<p style="text-align: right;">Page 85</p> <p>1 A No.</p> <p>2 Q Did you and P.D. ever have any sexual</p> <p>3 interaction?</p> <p>4 A No.</p> <p>5 Q I don't have any other questions for you,</p> <p>6 Ms. A.G., on that exhibit if you want to put it aside.</p> <p>7 I'm going to hand you what I'm marking next</p> <p>8 as Defendant's Exhibit 5, which again, is the FBI</p> <p>9 records of Zaccheus Obie's cell phone records.</p> <p>10 (Defendant's Exhibit 5 was marked for</p> <p>11 identification.)</p> <p>12 MR. STORY: And it is page Number 723</p> <p>13 and 24 for the record.</p> <p>14 BY MR. STORY:</p> <p>15 Q And if just real quickly, Ms. A.G., you'll</p> <p>16 turn to page 724 of the second page, that message 8611</p> <p>17 which is the second from the top. I'm going to read</p> <p>18 that and then I'm going to go to the front page to</p> <p>19 finish the conversation. I'm just trying to be as</p> <p>20 efficient as possible.</p> <p>21 From P.D. to you June 25, 2017, it says 7:23</p> <p>22 p.m., with the time change that would be 2:23 p.m.</p> <p>23 The text states, "What's your goal for tonight?" Ms.</p> <p>24 A.G. responds to P.D. and says, "To make more than I</p> <p>25 did last night. LOL." And then P.D. responds with</p>

A.G. v. Northbrook Industries

<p style="text-align: right;">Page 86</p> <p>1 what appears from my poor vision to be a smiley face 2 emoji, but I'm not sure. But I'm not going to ask you 3 about that. 4 So, Ms. A.G., this is that Sunday, 5 July 25th -- or excuse me, June 25th. At this point, 6 you'd had sex -- commercial sex with three men on 7 June 23rd and from anywhere to eight to ten men on the 8 night of June 24th. Do you have a recollection of the 9 customers that you had on the night of June 25th going 10 into the early morning hours of Monday, June 26th? 11 A No. 12 Q Okay. So sitting here right now, you don't 13 have any recollection of anyone else? 14 A Not -- I mean, I -- I remember there was 15 more that happened that night, but I can't remember 16 exactly how many or who. I think it's because, you 17 know, I remember more things than others with what 18 happened. But I know stuff did still happen on Sunday 19 night for sure. I just don't know how many. 20 Q Okay. Ms. A.G., I'm going to hand you what 21 I've marked as Defendant's Exhibit 6, which again, is 22 Zaccheus Obie's cell phone records from the FBI. 23 (Defendant's Exhibit 6 was marked for 24 identification.) 25 MR. STORY: It's pages 719 and 720 for</p>	<p style="text-align: right;">Page 88</p> <p>1 Q Okay. And then he says something about 2 stunning on your little partner. Do you know what 3 he's referring to there? 4 A No, I don't know exactly who he's talking 5 about. I know if he's talking about just our friends. 6 I'm not sure. 7 Q Did you have a boyfriend at the time? 8 A No, but Gregory that was living with us at 9 the time, that's -- 10 Q Payton's boyfriend? 11 A Mm-hmm, that's my now baby daddy. At the 12 time, I mean me and him were kind of on and off so 13 maybe he was talking about him. 14 Q Okay. Did you ever personally -- I'll 15 strike that. 16 My understanding is that every night that 17 you and G.W. made money, that money would be collected 18 the next morning by P.D. or one of his associates; is 19 that correct? 20 A Yes. 21 Q Did you yourself ever ask P.D. when am I 22 going to get paid? Why am I not getting any of this 23 money? 24 A Yes, I'm pretty sure we asked him like when 25 we would start making money, because he was taking</p>
<p style="text-align: right;">Page 87</p> <p>1 the record. 2 BY MR. STORY: 3 Q If you could flip to the second page, 720 4 for me. I'm going to read through the text message 5 conversation and then ask you some questions. 6 And I'm going to start 8566 which is a 7 message from Zaccheus Obie to Ms. A.G. It's June 25, 8 2017, with the time change, it'd be 3:09 p.m. Eastern. 9 It states, "That's why we really need to 10 stay down for about a good two weeks straight so when 11 y'all go back to visit the house, y'all can have shit 12 to show for it. And go out and splurge and stunt on 13 your little partner and show him how you came down to 14 the A and bossed the fuck up... so do we all agree to 15 stay down and get this money so I can send y'all back 16 looking like my bitches... so all your friends can be 17 wondering who you're fucking with so when you come 18 back, you might can bring one or two of them with 19 you." End of message. 20 Ms. A.G., what is -- what's P.D. talking 21 about when he says, when y'all do go back to visit the 22 house, y'all can have shit to show? Do you know the 23 house he's referring to? 24 A To my house, to my apartment at 110 B 25 Wilson.</p>	<p style="text-align: right;">Page 89</p> <p>1 everything that we were making. And he would just 2 tell us to give it time. That it would all work out. 3 And we would have everything that we wanted. Even 4 though right here in these messages, he says, you 5 know, if you stay for two weeks, I'll have y'all go 6 back, you know, looking like bosses. 7 Q Do you have any recollection of him talking 8 to you or G.W. in your presence about buying y'all a 9 house? 10 A He did talk to us about that. He said that, 11 you know, he would either have us an apartment or we 12 would be able to get a house if we just, you know, 13 stayed down and did what he told us to do. 14 Q Okay. And if you'll go to page 719 which is 15 the front page of Exhibit 6. And I'm going to start 16 at message 8560 which is a message from you to P.D. 17 June 25, 2017, with the time change it would be at 18 3:18 p.m. 19 Message states, "If you let us go home till 20 Thursday, we will come back and stay for two weeks 21 because we got to go home and get all of our shit in 22 line and stuff like that." And then 30 seconds later, 23 you send P.D. another message saying, "Is this all 24 we're going to be doing for those two weeks?" And 25 P.D. responds to you and says, "No, I got other moves</p>

A.G. v. Northbrook Industries

<p style="text-align: right;">Page 94</p> <p>1 A No, I do not.</p> <p>2 Q And this message of you saying, only like</p> <p>3 \$150, it was dead last night, with the time change</p> <p>4 that would be at 1:30 a.m. on Monday morning, Sunday</p> <p>5 night. Is it fair to say that you would have been</p> <p>6 talking about Sunday night?</p> <p>7 A Yes.</p> <p>8 Q Okay. Based on your knowledge of what you</p> <p>9 would charge for commercial sex services during that</p> <p>10 time, do you have an idea of how many customers it</p> <p>11 would take for you to earn \$150?</p> <p>12 A It might have been two or three.</p> <p>13 Q Okay. And do you remember why you were</p> <p>14 asking P.D. about getting separate rooms?</p> <p>15 A I think that it was because, like I said,</p> <p>16 people were wanting to just be in a room by themselves</p> <p>17 and that's why we said that. And also, it felt like I</p> <p>18 was the only one that was doing anything, like, G.W.</p> <p>19 would make me -- she would just sit there while I</p> <p>20 would be having sex with the guys or, you know, oral</p> <p>21 sex with the guys. And so I think I also said it</p> <p>22 because I felt like, if we had our own rooms, we each</p> <p>23 had to do our own thing. It wouldn't all depend on</p> <p>24 one of us to be doing everything.</p> <p>25 Q Okay. I'm going to hand you what I'm</p>	<p style="text-align: right;">Page 96</p> <p>1 was mad LOL."</p> <p>2 And P.D. says to you, "My traveler should be</p> <p>3 there in a -- so y'all be ready. And when you get</p> <p>4 home make sure y'all check in with me on a daily basis</p> <p>5 to let me know y'all straight."</p> <p>6 And then there's another message at the top,</p> <p>7 8407 from P.D. to you that states, "No, baby girl, I</p> <p>8 don't get mad. Then why would I be mad at you? We on</p> <p>9 the same team. I'll get mad for you but not at you.</p> <p>10 We are one."</p> <p>11 Going to page 706, you respond and say,</p> <p>12 "Okay. That's good." And then we'll stop there.</p> <p>13 So on that Monday morning, did you P.D. pick</p> <p>14 you up in the United Inn?</p> <p>15 A No.</p> <p>16 Q What he calls his traveler picked you up?</p> <p>17 A Yes.</p> <p>18 Q What was that?</p> <p>19 A I'm not -- I assume that it was Kiki, but</p> <p>20 I'm not for sure on that.</p> <p>21 Q Whoever did pick you up, did they take you</p> <p>22 and G.W. back to Commerce?</p> <p>23 A Yes.</p> <p>24 Q And did -- why did you call Zaccheus Obie</p> <p>25 P.D.?</p>
<p style="text-align: right;">Page 95</p> <p>1 marking Defendant's Exhibit 9.</p> <p>2 (Defendant's Exhibit 9 was marked for</p> <p>3 identification.)</p> <p>4 Again, these are from the FBI search of</p> <p>5 Zaccheus Obie's phone. There's a decent bit of pages</p> <p>6 in this exhibit so it's going to take a second to go</p> <p>7 through, but it's pages 704, 705, 706, and 707. We're</p> <p>8 going to start at 707, Ms. A.G., and work our way back</p> <p>9 from there.</p> <p>10 And specifically, I'm going to message 8415</p> <p>11 which is a message from you to P.D. on June 26, 2017,</p> <p>12 which was a Monday. If you take into the account the</p> <p>13 time change, it would be at 6:28 in the morning.</p> <p>14 You state, "You can come in now."</p> <p>15 P.D. responds, "What was the reason I had to</p> <p>16 wait outside?"</p> <p>17 You say, "G.W. was changing and we had to</p> <p>18 clean our room."</p> <p>19 P.D. says to you, "Man, y'all ain't got</p> <p>20 nothing that I ain't never seen before."</p> <p>21 You respond, "Okay. LOL. We'll let you in</p> <p>22 next time."</p> <p>23 P.D. says, "Man, y'all hell. I fuck with</p> <p>24 y'all though."</p> <p>25 You respond and state, "Good, we thought you</p>	<p style="text-align: right;">Page 97</p> <p>1 A Because he wanted us to call him daddy and</p> <p>2 we looked at him as a pimp. And so we just -- P.D.,</p> <p>3 Pimp Daddy.</p> <p>4 Q Okay. And did you and G.W. create that</p> <p>5 nickname?</p> <p>6 A Yes.</p> <p>7 Q Okay. Are you on page 706 still?</p> <p>8 A Oh.</p> <p>9 Q That's okay. That's all right. I'm going</p> <p>10 to start with message 8404, it's towards the bottom.</p> <p>11 It's from P.D. to you on June 26, 2017, which that</p> <p>12 Monday, reset for time, 7:24 a.m. Eastern.</p> <p>13 Message states, "I just wasn't very</p> <p>14 talkative because it's -- I had so much to do. I rip</p> <p>15 and run all night watching y'all backs. And I rip and</p> <p>16 run all day handling the other end of the business.</p> <p>17 So I just had other moves that I had to go and make</p> <p>18 really fast. That's all. We good, we'll a family."</p> <p>19 You respond and say, "Oh, okay. We understand. We're</p> <p>20 going to miss you these next few days though, but we</p> <p>21 got you like you got us." He responds with an acronym</p> <p>22 to you saying, "L.L.R." You say, "What's that?" He</p> <p>23 responds back, "Love, loyalty, and respect."</p> <p>24 If you'll turn to the next page 705. You</p> <p>25 message to him, "We're hungry, LOL." P.D. says to</p>

A.G. v. Northbrook Industries

<p style="text-align: right;">Page 98</p> <p>1 you, "Y'all don't stop and get something to eat on the 2 way home." He then sends another message to you a 3 minute later, and this is at 7:35 a.m. Eastern on 4 June 26, 2017, "Head out the door, the car is out 5 there waiting. Call me when you get home." 6 He sends another message to you, "Delete 7 your text inbox of our conversations." He then sends 8 you another message, "I'm going to miss you so don't 9 keep me waiting too long." You respond and say, "We 10 won't, daddy." And going to 704 the front page. P.D. 11 says to you, "L.L.R., remember this because this is 12 what we all have for one another. This is what we 13 represent." 14 Ms. A.G., at this point, I mean, would you 15 agree with me that love, loyalty, and respect is not 16 what P.D. was showing you? 17 A Yes, he was not showing us that. I think he 18 was just trying to manipulate us and get us to trust 19 him by saying that. 20 Q And I mean, at this point you're getting 21 these messages, you're 17 years old, I know you're not 22 18 yet, but you're a month away from 18. You've been 23 through high school at Commerce High, are you playing 24 his game to get away from him? 25 A Yes.</p>	<p style="text-align: right;">Page 100</p> <p>1 from the commercial sex services you'd been providing? 2 A No. 3 Q So you get back -- how long is the drive 4 from Atlanta to Commerce? 5 A It's about an hour, 15 minutes, maybe a 6 little longer. 7 Q You get back to Commerce, do you tell 8 anybody about what's happened? 9 A I think we sat and talked with Gregory and 10 Payton. And we told Payton this is nothing what you 11 told us, how it was going to be. 12 Q Was G.W. staying with you still? 13 A Yes, we stayed at -- we went back to my 14 house and was there for a little while, yes. 15 Q Did you tell your mom about going to Atlanta 16 for that weekend of June 23rd to the 25th? 17 A I'm not sure if I told her exactly what had 18 happened that weekend. But before I had left, I had 19 told her that I was moving to Atlanta with a friend 20 for the summer. And that was all I had told her, the 21 information I gave her. And she just kind of had a 22 bad feeling about it as a parent. 23 Q Is your mom friends with G.W.'s mom? 24 A I wouldn't say friends. I would say they 25 have "talken" a couple times here and there, but</p>
<p style="text-align: right;">Page 99</p> <p>1 Q You didn't buy this love, loyalty, and 2 respect stuff that he was speaking, did you? 3 A I feel like at the time, by -- this is at 4 the end of the weekend, I think we were more scared, 5 and we were playing the part so we could get to go 6 home. Because we were scared if we didn't, he 7 wouldn't have let us go home. Because he did not want 8 us to go home. So I do believe that we were just 9 playing into what he wanted us to say. 10 Q I understand. And do you think you were 11 saying we and I know that you're speaking on your 12 behalf and your knowledge, but the reality is you 13 don't ever come back and G.W. does. Based on your 14 observations, was it your understanding that on Monday 15 June 26, 2017, it was G.W.'s position of let's get out 16 of here, go back home to Commerce, and never come 17 back? 18 A Yes, I definitely feel like she felt the 19 same way at that time. We just didn't know exactly 20 how to do it. And how to get out of it. 21 Q And when y'all get taken back -- y'all did 22 get taken back? When whoever picked you up, they did 23 take you back to Commerce on June 26th? 24 A Yes. 25 Q And did you have a dollar in your pocket</p>	<p style="text-align: right;">Page 101</p> <p>1 that's it. 2 Q Like, do you think your mom had G.W.'s mom's 3 cell phone number back then? 4 A No. 5 Q I'm going to hand you what I'm marking as 6 Defendant's Exhibit 10. 7 (Defendant's Exhibit 10 was marked for 8 identification.) 9 Not to sound like a broken record, but this 10 is again from FBI records of Zaccheus Obie's cell 11 phone records. And it's pages 681 and 682. I want to 12 start on page 682, specifically message 8115. 13 And this is a message from you to P.D. on 14 June 28, 2017, at 11:37 so really that's 6:37 p.m. 15 Eastern. And just to give you full context, that's on 16 Wednesday. So you got home on Monday, this is on 17 Wednesday. 18 A Okay. 19 Q You say, "I just want to let you know, I'm 20 not coming tomorrow. I'm going to come Sunday. I 21 will even get somebody to bring me if I have to. And 22 I wanted to ask you another question. If I were to 23 wait till I was 18 to come back, would I still have to 24 go through all these steps?" And then he 25 responds -- P.D. responds to you and says, "Yes."</p>

A.G. v. Northbrook Industries

<p style="text-align: right;">Page 102</p> <p>1 What did you mean about waiting till you're</p> <p>2 18 to come back if you'd still have to go through all</p> <p>3 these steps?</p> <p>4 A Like, if I were to come back when I was 18,</p> <p>5 would I just be able to dance? Would you not make me</p> <p>6 have sex for money?</p> <p>7 Q Was there a time that he told you that the</p> <p>8 reason you were having sex for money as opposed to</p> <p>9 dancing for money was because you were not 18?</p> <p>10 A Yes.</p> <p>11 Q And how did he -- what was his reasoning for</p> <p>12 that?</p> <p>13 A Because we didn't have an ID to be able to</p> <p>14 work, like, and dance.</p> <p>15 Q Going back really quick to that group of</p> <p>16 Mexican guys. Did any of them ask you if you were</p> <p>17 under 18?</p> <p>18 A Not that I can remember.</p> <p>19 Q And then that next group that came back with</p> <p>20 the two guys that y'all had met on Friday night, did</p> <p>21 anybody in that group ask if you were under 18?</p> <p>22 A Not that I can remember. But I know there</p> <p>23 was at one point, somebody who told us that we looked</p> <p>24 pretty young. And that we definitely looked too young</p> <p>25 to be out there doing what we were doing.</p>	<p style="text-align: right;">Page 104</p> <p>1 with G.W. about, you know, this isn't what we signed</p> <p>2 up for, let's call this lady?</p> <p>3 A No, I don't think we ever did talk about</p> <p>4 really calling her. We were -- we were kind of scared</p> <p>5 to reach out to anybody while we were down there</p> <p>6 because, like, you know, he kept saying he was</p> <p>7 watching us. And we didn't know who was involved, who</p> <p>8 was watching us, or who was where. And especially</p> <p>9 because my phone came from him, and I didn't know if</p> <p>10 he could see stuff that I was doing on my phone too.</p> <p>11 Q Okay. I'm going to hand you what I'm</p> <p>12 marking as Defendant's Exhibit 11.</p> <p>13 (Defendant's Exhibit 11 was marked for</p> <p>14 identification.)</p> <p>15 Again, this is from the FBI records of</p> <p>16 Zaccheus Obie's cell phone, and it is page 679, for</p> <p>17 the record. And I want to draw your attention, Ms.</p> <p>18 A.G., to the bottom message which is 8082 and it's</p> <p>19 from P.D. to you. And it says June 29th, but if you</p> <p>20 do the time change, that's really June 28th which was</p> <p>21 a Wednesday at 10:09 p.m. And the message states,</p> <p>22 "So how do you think you did on your test ???"</p> <p>23 Tell me, what is P.D. is talking about if</p> <p>24 you know?</p> <p>25 A I do not know.</p>
<p style="text-align: right;">Page 103</p> <p>1 Q Was it a lady in the parking lot of United</p> <p>2 Inn who said, y'all don't need to be doing this, and</p> <p>3 handed you a business card?</p> <p>4 A That was a different one. That was somebody</p> <p>5 else who said that to us. But we had -- I</p> <p>6 had -- there was one of the customer -- or</p> <p>7 somebody -- we were either just talking to him about</p> <p>8 it. About making a play or whatever about having sex</p> <p>9 for money and he was like, I don't know, y'all look</p> <p>10 kind of young. Y'all look too young to be out here</p> <p>11 doing this.</p> <p>12 And that was -- and then the lady was a</p> <p>13 different time. Somebody told us that we looked too</p> <p>14 young and gave us a card that -- if we needed help.</p> <p>15 Q Tell me about the lady that gave you the</p> <p>16 card? Did she just hand you the card, say, y'all look</p> <p>17 too young, you don't need to be doing this. If you</p> <p>18 need help, call this number?</p> <p>19 A Yes.</p> <p>20 Q Did you keep that card?</p> <p>21 A I'm not sure. I know I don't have it now,</p> <p>22 but I'm not sure. I'm sure we held onto it for a</p> <p>23 little while. But I don't know whatever happened to</p> <p>24 it.</p> <p>25 Q Do you remember ever having a conversation</p>	<p style="text-align: right;">Page 105</p> <p>1 Q Okay.</p> <p>2 A I'm sure it's some excuse I came up with as</p> <p>3 to why I could not go back.</p> <p>4 Q Next, I'm going to hand you what I'm marking</p> <p>5 as Defendant's Exhibit 12.</p> <p>6 (Defendant's Exhibit 12 was marked for</p> <p>7 identification.)</p> <p>8 Again, this is Zaccheus Obie's cell phone</p> <p>9 records, and the pages are 622, 623, and 624. Ms.</p> <p>10 A.G., we're going to start at 624 and work our way up</p> <p>11 to the front. So I'm going to start at message 7418,</p> <p>12 it's towards the bottom. And this is a message from</p> <p>13 you to P.D. July 1, 2017, adjusted for the time change</p> <p>14 it would be at 3:27 p.m. And just to keep our</p> <p>15 reference points, Ms. A.G., this is on the Saturday.</p> <p>16 So came home on Monday, this is that Saturday.</p> <p>17 A Okay.</p> <p>18 Q You text P.D. and say, "You wanted me to</p> <p>19 text you." P.D. responds, "Light Bright what time do</p> <p>20 you need to see your mother?? And why haven't you</p> <p>21 already taken care of all of that? I got a lot of</p> <p>22 stuff planned for tomorrow. I got a lot of different</p> <p>23 moves that I have to make and I'm trying to beat the</p> <p>24 traffic." He then sends a message immediately after</p> <p>25 that says, "Light Bright, what" -- and then it's</p>

A.G. v. Northbrook Industries

Page 114	Page 116
<p>1 reaching out.</p> <p>2 A Yeah, I know it wasn't very much. It was</p> <p>3 only a couple times that he tried to reach out to me</p> <p>4 and get me to come back. But that was it.</p> <p>5 Q Did he ever threaten you about if you don't</p> <p>6 come back, I will...?</p> <p>7 A No, he never directly threatened me or</p> <p>8 anything.</p> <p>9 Q Did you feel like you had put yourself in</p> <p>10 harm's way by deciding not to go back when you were</p> <p>11 taken home on June 26th of 2017?</p> <p>12 A Yes, I was very afraid whenever I went back</p> <p>13 because they knew where I lived at. That's what</p> <p>14 scared me the most. And also, because I didn't know</p> <p>15 him, and I did not know what he was capable of.</p> <p>16 Q And is there anything that you're aware of?</p> <p>17 Like, any consequence that you suffered as a result of</p> <p>18 not coming back that you believe was the</p> <p>19 responsibility of P.D. or his associates?</p> <p>20 A As -- like, as far as what?</p> <p>21 Q So you told me that you were scared when you</p> <p>22 didn't come back because they knew where you lived.</p> <p>23 Do you remember that?</p> <p>24 A Yes.</p> <p>25 Q See? You're correcting yourself. My</p>	<p>1 would get mad at her. So I think that's the reason I</p> <p>2 was still kind of just telling him things that he</p> <p>3 wanted to hear.</p> <p>4 Q And you know, this is like 18 or 19 -- or</p> <p>5 excuse me. It's actually like three weeks after you</p> <p>6 had returned home. Are you still -- would you still</p> <p>7 have been talking to G.W. every day?</p> <p>8 A I don't know -- I don't think we were</p> <p>9 talking every day. We had talked, you know, here and</p> <p>10 there, but I don't think we talked every day.</p> <p>11 Q Do you remember a time that G.W. told you</p> <p>12 after you came back to Commerce that she was starting</p> <p>13 to like it?</p> <p>14 A I think she was starting to get more</p> <p>15 comfortable.</p> <p>16 Q Okay. And that's just based on the context</p> <p>17 of the conversations you were having with her?</p> <p>18 A Right.</p> <p>19 Q When did you -- I'll represent to you that</p> <p>20 on July 23, 2017, P.D. was arrested. I can't remember</p> <p>21 if it was by the FBI or GBI, but he was arrested and</p> <p>22 Kiki was in the car with him, and G.W. was in the car</p> <p>23 with him. And so that would have been July 23, 2017,</p> <p>24 which that was the Sunday. So just under four weeks</p> <p>25 from when you had been back, do you remember the first</p>
Page 115	Page 117
<p>1 question is: Did anything actually happen?</p> <p>2 A No, nothing actually happened to my</p> <p>3 knowledge that I know of.</p> <p>4 Q Okay. This is on July 19th, when you say, I</p> <p>5 just got a job and I start school on August 10th. Do</p> <p>6 you know if that's the truth or were you just lying to</p> <p>7 him?</p> <p>8 A I'm pretty sure that's the truth.</p> <p>9 Q Okay. Do you remember what job you had</p> <p>10 gotten?</p> <p>11 A I'm not sure.</p> <p>12 Q Was this the time of Ryan's steakhouse?</p> <p>13 A It probably was Ryan's, I -- I'm thinking.</p> <p>14 Q Okay. Tell me what your basis for saying if</p> <p>15 you can recall when you say, "It's not even because I</p> <p>16 think it's bad or anything, I believe G.W. is really</p> <p>17 likening it right now." What made you say that?</p> <p>18 A I just didn't want him to think -- or I just</p> <p>19 didn't want him to be mad at me and think that that</p> <p>20 was the reason that I wasn't there, even though it</p> <p>21 was. Because I knew that G.W. was still there and I</p> <p>22 did not want her to get her. So I was trying to have</p> <p>23 her back from a distance even without being there</p> <p>24 because I was scared, you know, based on the things</p> <p>25 that I would say something could happen to her or he</p>	<p>1 time you heard about that happening?</p> <p>2 A I don't recall exactly when it was and how I</p> <p>3 heard about it.</p> <p>4 Q Okay. Did you get contacted by the police?</p> <p>5 A By the FBI? I don't -- I know I had contact</p> <p>6 with the FBI but I'm not exactly sure who all I talked</p> <p>7 to.</p> <p>8 Q And what do you remember about the initial</p> <p>9 contact? What did they say to you?</p> <p>10 A I'm not sure if we had, like, talked on a</p> <p>11 phone call before, but I know they ended up coming to</p> <p>12 the house and we sat down and talked about what had</p> <p>13 happened. And that's when they took my phones. And</p> <p>14 that was the first time I feel like my mother was</p> <p>15 there and we all sat down and talked about it.</p> <p>16 Q Did they take both of your phones?</p> <p>17 A Yes.</p> <p>18 Q When did they give them back?</p> <p>19 A Years later.</p> <p>20 MR. BOUCHARD: At a logical breaking</p> <p>21 point, can we take a break? Whenever?</p> <p>22 MR. STORY: We're at it.</p> <p>23 MR. BOUCHARD: Okay. Yeah?</p> <p>24 MR. STORY: Let's take a five,</p> <p>25 ten-minute break if we can go off the record.</p>

A.G. v. Northbrook Industries

<p style="text-align: right;">Page 118</p> <p>1 THE REPORTER: We're off the record at 2 2:06 p.m. 3 (Off the record.) 4 THE REPORTER: And we are back on the 5 record at 2:24 p.m. 6 BY MR. STORY: 7 Q All right. Ms. A.G., we're back on the 8 record so we've gone through the time that -- I'm just 9 going to say that you were in Atlanta. And you got 10 there on the 22nd of June 2017, left the morning of 11 June 26th, that following Monday. 12 And based on what we've talked about, my 13 understanding is you were at a hotel on Fulton 14 Industrial the night of June 22nd and then you were at 15 the United Inn on June 23rd, 24th, and 25th and 16 checked out the 26th. Generally speaking, how did you 17 go about engaging with speaking to potential customers 18 during that time period? 19 A We would just ask them what they were 20 looking for. That's all we would ask them. And then 21 they would tell us and then we would give them a 22 price. 23 Q During that time, were you or G.W. being 24 contacted by any people who were finding your 25 information on online advertisements?</p>	<p style="text-align: right;">Page 120</p> <p>1 from that, we would basically just stay mostly down at 2 the bottom in the parking lot or right there in front 3 of the parking lot where the red light was. 4 Q When you say down at the bottom, do you mean 5 the back parking lot? 6 A No, like, the bottom of the hill of Memorial 7 Drive where the hotel is. 8 Q Okay. I'm going to hand you what I've 9 marked as Defendant's Exhibit 14. 10 (Defendant's Exhibit 14 was marked for 11 identification.) 12 And these are Plaintiff's Responses to 13 Defendant's Request for Admissions to Plaintiff. And 14 I've just got a few questions that -- and I think I'm 15 going to be able to get through this pretty quickly. 16 But before we go into this, I do want to ask you about 17 one other thing. 18 So you understand that Zaccheus Obie, who 19 we're referring to as P.D., that he pled guilty to 20 minor sex traffic charges and is currently serving a 21 prison term for that? 22 A Yes. 23 Q And is it fair to say that you were supposed 24 to speak at P.D.'s criminal sentencing? 25 A Yes.</p>
<p style="text-align: right;">Page 119</p> <p>1 A No. 2 Q So when you were at the United Inn, do you 3 know if P.D. had his own clientele that he would send 4 to you? 5 A Not that I'm aware of. 6 Q Okay. So ultimately, you would -- if you 7 were at the United Inn, you would get customers from 8 walking Memorial Drive is one way; is that correct? 9 A Yes. 10 Q And you would also get them at the gas 11 station nearby; is that correct? 12 A Yes. 13 Q And then you would also get customers in the 14 parking lot of United Inn; is that correct? 15 A Yes. 16 Q Is there anywhere else that you can remember 17 while at United Inn that you would locate customers 18 and speak with them? 19 A Well, I know we would just be standing like, 20 around the hotel. So, like, in front of it on the 21 sidewalk in front of it instead of walking, 'cause 22 there's like a red light. And so we would stand right 23 there where the red light is. Right in front of there 24 occasionally, but after, you know, the first day of 25 walking up and down Memorial Drive and being so tired</p>	<p style="text-align: right;">Page 121</p> <p>1 MR. BOUCHARD: Object to form. 2 BY MR. STORY: 3 Q Why did you not speak at his sentencing? 4 A I got really sick right before I -- we were 5 supposed to go down there. And I couldn't go anymore. 6 Q Did you get the opportunity to write a 7 letter to the court? 8 A They said that I could write a letter, but I 9 was so sick, I couldn't even get out of bed more or 10 less write something down to be spoken in court. 11 Q Okay. So the reason that you didn't write a 12 letter is because you were sick? 13 A Yes. I do wish that I could have spoken 14 and -- or even wrote a letter for them to read. 15 Q What would you have said? 16 A Just that, you know, what happened to us, I 17 wouldn't have wished this on anyone else. And I'm 18 glad that, you know, we had people who was looking out 19 for us and got him, P Diddy, like, found out. Like 20 G.W.'s mom, for example, I'm glad that, you know, we 21 had her looking out for us and for her daughter 22 that -- to help her and -- so that way he could get 23 what he deserved for us having to deal with this for 24 the rest of our life. Because, you know, we didn't 25 have nobody while we were down there looking out for</p>

A.G. v. Northbrook Industries

<p style="text-align: right;">Page 122</p> <p>1 us. And maybe if we would have, then this would have 2 ended a lot sooner and we wouldn't have all of this to 3 carry on with us throughout our life. 4 And, you know, I may have to live with, you 5 know, this -- what word? Like, loss of self-respect 6 for myself from this. Like, maybe I wouldn't have to. 7 But I'm glad that it did -- eventually somebody stood 8 up for us. That's just what I would have said because 9 I'm glad that he ended up where he's at and not 10 continuing what he was doing with other young girls or 11 who knows who else. 12 Q Do you remember whether it was you or G.W. 13 who first reached out to -- I keep on forgetting 14 Quintavious is Swayzii? 15 A Swayzii. 16 Q Swayzii. 17 A I'm pretty sure that it was G.W., I'm 18 not -- I'm not for sure. I don't know if it was me or 19 G.W. first. 20 Q Do you know, putting you and G.W. in the 21 same group and then Swayzii and P.D. in a different 22 group, who contacted who first, do you know? 23 A We contacted Swayzii first. 24 Q Okay. Can you turn to page 8 of Exhibit 14? 25 And, Ms. A.G., I just want to explain what this is.</p>	<p style="text-align: right;">Page 124</p> <p>1 for the sake of efficiency, I'm not going to go 2 through every one of these. But on page 11, the 3 requests are to admit that you were never physically 4 present at the United Inn & Suites, and it goes from 5 June 27th to July 1st. We talked about earlier you'd 6 gotten taken back to Commerce on June 26th? 7 A Yes. 8 Q So is it accurate to say that from June 27, 9 2017, to July 1, 2017, you were never physically 10 present at the United Inn & Suites? 11 A Yes. 12 Q And is it also accurate to say that from 13 July 2, 2017, to July 23, 2017, all days in between, 14 you were never physically present at the United Inn & 15 Suites? 16 A Yes. 17 Q If you can go to page 12. Number 31 says 18 admit that you never saw an employee of the United Inn 19 & Suites have a conversation with Kikia Anderson. The 20 response is denied. So I take that to mean that you 21 did see an employee of United Inn & Suites talking 22 with Kikia Anderson. Based on what I've heard 23 today -- let me just ask you. Did you ever see an 24 employee of the United Inn & Suites having a 25 conversation with Kikia Anderson?</p>
<p style="text-align: right;">Page 123</p> <p>1 You might have never seen this. What these are called 2 are requests for admission. And in just plain 3 English, how it works is, I send to your attorney a 4 request that says, admit this fact. Your attorney 5 speaks with you, but your attorney responds. So these 6 responses are what your attorney drafted on your 7 behalf. And I think after we've -- I've heard your 8 testimony today I just want to clarify and make sure 9 that I'm right on a few things. So when you're 10 looking at this, I just want you to understand, I'm 11 not saying that you are the one who actually drafted 12 this response. But I want to ask you first about 13 number 16. 14 A Okay. 15 Q And it says admit that you were never 16 physically present at the United Inn & Suites on 17 June 22, 2017. The response the denied. Ms. A.G., so 18 June 22nd was that Thursday that y'all are on Fulton 19 Industrial. Now that we've talked about it today and 20 gone through the dates and gone through the text 21 messages, is it accurate to say that on June 22, 2017, 22 you were never physically present at the United Inn & 23 Suites? 24 A Yes. 25 Q All right. Can you turn to page 11? And</p>	<p style="text-align: right;">Page 125</p> <p>1 A No. 2 Q And Kikia Anderson and Kiki Anderson are the 3 same person; correct? 4 A I'm not sure. 5 Q Okay. Did you ever see Doc have a 6 conversation with an employee at the United Inn & 7 Suites? 8 A Not that I seen. 9 Q Did you ever see P.D. have a conversation 10 with any employees or staff at the United Inn? 11 A Not that I'd seen. 12 Q Did you ever -- strike that. 13 Did you ever yourself speak in person with 14 an employee or staff member of the United Inn in June 15 of 2017? 16 A Yes. 17 Q Tell me about that. 18 A Well, we had gotten locked out of the room 19 at one point. And had to go up to the desk to be let 20 back into the room, because we had left our keys in 21 the room. And whenever we did that, they had to make 22 a phone call because our names was not on the room for 23 us to be let back in. And then they walked us back 24 down to the room and let us into the room. 25 We had also went up to the desk one night to</p>

A.G. v. Northbrook Industries

<p style="text-align: right;">Page 126</p> <p>1 go and purchase condoms. And then we had also talked 2 to a housekeeper about getting towels one day. 3 Because P Diddy did not want us to have housekeeping 4 coming into the room. 5 Q Do you know why P.D. didn't want y'all to 6 have housekeepers come into the room? 7 A He didn't really say why. 8 Q So the time that you had to go back in the 9 lobby to get a key, did you go back in, what did you 10 say to the employee? 11 A That we had locked ourself out of the room 12 and that our name was not on the reservation. Could 13 they still let us in? And they were like, well, we're 14 going to have to talk to who's on the reservation. 15 Q And do you remember -- do you know the name 16 of the employee that you were communicating with? 17 A No. 18 Q Can you describe them physically? 19 A I am not sure if it was -- I'm not sure if 20 there was one or two people up there at the time. But 21 I know -- I remember seeing a guy up there, but I 22 think there was also a girl. Because when we'd said 23 that we weren't on the room -- like, our names wasn't 24 on there, I'm pretty sure he had to go ask what to do 25 to be able to let us back in. And it was -- Indian</p>	<p style="text-align: right;">Page 128</p> <p>1 So did the Indian man talks to -- and I'm just going 2 to call him the Indian man, so you and I are on the 3 same page. He talks to P.D., and then does he just 4 give y'all a key? 5 A He walks us down to the room and lets us in. 6 Because we had just left our keys in the room. So 7 there was no reason to give us another key, we just 8 needed to be let back in so we could get our key. 9 Q Okay. So he almost like -- he went and used 10 like a master key to let y'all back in? 11 A Yes. 12 Q Understood. Did y'all have any other 13 conversation with this Indian man outside of we left 14 the key in our room, and it's not registered in our 15 name? 16 A No. 17 Q Tell me about buying condoms. Do you 18 remember who you bought the condoms from? 19 A I'm not exactly sure who was up there that 20 night that we bought them from. 21 Q Do you remember anybody in the lobby other 22 than the Indian man and woman that you've described? 23 A No. 24 Q How did you pay for the condoms? 25 A With cash.</p>
<p style="text-align: right;">Page 127</p> <p>1 man. He was an Indian man, kind of older. Probably 2 in his like, 40s. 3 Q And he was the one who y'all talked to about 4 getting the key? 5 A Yes. 6 Q And based on your recollection, you believe 7 he wasn't really sure what to do so he had to go ask 8 somebody else? 9 A Yes. 10 Q And did y'all have to get P.D. to call the 11 front desk to say they're authorized to have a key? 12 A I'm not sure if we told him to call up there 13 or if they like, looked up the number and called him. 14 I'm not really sure how that phone call went. I just 15 know for sure there was a phone call. 16 Q Understood. The girl that he went and 17 asked, did you see her? 18 A I saw her walk out but just for a second for 19 them to talk and then go back in. 20 Q What did she look like? 21 A Dark hair, she was Indian as well. She 22 probably looked about in her 40s. I'm not really good 23 with age, but -- 24 Q That's okay. I'm just asking for your best 25 recollection. I appreciate you cooperating with me.</p>	<p style="text-align: right;">Page 129</p> <p>1 Q Did P.D. not provide y'all with condoms? 2 A No. 3 Q And was the housekeeper that you interacted 4 with about getting towels, was that a female? 5 A Yes. 6 Q Okay. And what race was she if you know? 7 A Possibly Indian too. 8 Q Did she get you towels? 9 A Yes. 10 Q Did you have any other conversations with 11 her besides, can we get towels? 12 A No. 13 Q And I know you don't remember who exactly 14 you interacted with when you bought condoms, but did 15 you have any other conversation other than I want 16 those condoms and the transaction? 17 A No. 18 Q I don't have any other questions on that. 19 Now I'm going to hand you what I'm marking as 20 Defendant's Exhibit 15, which is Plaintiff's Responses 21 to Defendant's Interrogatories. 22 (Defendant's Exhibit 15 was marked for 23 identification.) 24 And, Ms. A.G., just for your benefit, 25 interrogatories are tools that lawyers have to get</p>

A.G. v. Northbrook Industries

<p style="text-align: right;">Page 130</p> <p>1 information from the opposing party. Again, I know 2 that you did not write these responses out. 3 But what we do as attorneys is we get 4 information from our client and then we draft the 5 responses. So I'm going to be asking you about these 6 responses, but just know I understand that you didn't 7 sit there and type it up. I'm just trying to get 8 clarification, make sure I know everything you know. 9 A Okay. 10 Q All right. So the first interrogatory asks 11 for -- we just asked you generally to identify the 12 dates you were trafficked and basically the 13 information you had surrounding those dates. If you 14 turn to page 3, I'm not going to read the full 15 response, I'm just going to direct you to where I have 16 questions. And I should have said this before, but if 17 there's a time where you're like, I don't really know 18 what he's talking about, I want to read the whole 19 thing, just tell me. 20 A Okay. 21 Q And you got every right to -- and I'll sit 22 back until you finish reading the full response. So 23 if you get confused just let me know. So -- you on 24 page 3? 25 A Yes.</p>	<p style="text-align: right;">Page 132</p> <p>1 that that happened besides the one time. And like I 2 said, he -- I cried and told him to get off me and so 3 he slapped me and continued until he was finished. 4 Q Was P.D. ever violent to you? 5 A He got pretty aggressive with me and got in 6 my face because he was mad that I didn't want to wear 7 heels while walking around and told me that nobody 8 would want to talk to me looking like that. So he did 9 scream at me. 10 Q And when would that have been? 11 A I know we were at the United Inn when this 12 happened, when he was screaming at me, but I think 13 that it was Saturday, but I'm not for sure. 14 Q When you were at the United Inn, did P.D. 15 come back every morning to pick up the money? 16 A Yes. And then he would disappear for a 17 little while and then come back into the room and talk 18 to us and then leave. 19 Q And y'all were in room 112 the whole weekend 20 though? 21 A Yes. 22 Q Moving down in that paragraph, it says, 23 "Zaccheus Obie, or his associates came to the room and 24 collected the money that Plaintiff G.W. and Plaintiff 25 A.G. received from sex buyers." I'm going to ask you</p>
<p style="text-align: right;">Page 131</p> <p>1 Q This first full paragraph that starts with, 2 "When plaintiff" -- do you see this? 3 A Okay. 4 Q So the second sentence of that paragraph 5 says, "To the best of plaintiff's current 6 recollection, she was victimized in one of the 7 following rooms, or a room nearby, 117, 118, 119, 8 120." End of sentence. Based on what we've discussed 9 today, I believe the only room that you were in at the 10 United Inn was room 112; is that accurate? 11 A Yes. 12 Q The next sentence says, "Plaintiff had sex 13 for money with at least 15 men over the period she was 14 at the United Inn & Suites." I'm not asking you to 15 give me an exact number, it was a long time ago. And 16 we've gone over -- I know it's a group of four or five 17 men twice and then three the first night. So now that 18 we've kind of relived that weekend, you still believe 19 15 is an accurate number? 20 A Approximately, yes. 21 Q Other than the gentleman who talked about 22 who slapped you in the face and held you down, did 23 anyone else physically force themselves upon you? 24 A No, not like, me telling them no and then 25 them still doing it anyways. No, I had no other time</p>	<p style="text-align: right;">Page 133</p> <p>1 who -- tell me everybody that you can think of who you 2 consider an associate of Zaccheus Obie or P.D.. 3 A The person who -- the woman who drove us 4 down there, who picked us up from Commerce and dropped 5 us off. 6 Q Kiki; right? 7 A I'm not for sure if that was her name. 8 Q Okay. And you're talking about the one who 9 picked you from Commerce to take you to Atlanta? 10 A Yes. 11 Q Okay. Okay. Who else? 12 A And the other guy who we picked up when we 13 were going to the United Inn. I think his name was 14 Doc. 15 Q Anyone else? 16 A As far as I know, that's all I know about. 17 I'm not sure if he knew anybody from the hotel or 18 anywhere else around us. Like, if he had other people 19 staying in the hotel that he knew, because, like I 20 said, when he would come in the mornings, he would 21 come in there first and then he would go and disappear 22 for about, like, 20 minutes to 30 minutes and then 23 come back. But he would still be like on the hotel 24 premises. 25 Q How would you know that he was in the hotel</p>

A.G. v. Northbrook Industries

<p style="text-align: right;">Page 134</p> <p>1 premises?</p> <p>2 A Because he was still parked outside. His</p> <p>3 car was still parked in front of our room.</p> <p>4 Q Who took you back to Commerce on Monday?</p> <p>5 A The same lady that had picked us up.</p> <p>6 Q So do you know Kiki Anderson?</p> <p>7 A I'm not -- I'm -- I think that it was the</p> <p>8 driver, but I'm not for sure. That's just from the</p> <p>9 knowledge that I have now. But at the time, I did not</p> <p>10 know that was her name or -- and I'm still not</p> <p>11 completely sure that's her name. I just know it was a</p> <p>12 heavy-set African American lady and it's it. That's</p> <p>13 all I know.</p> <p>14 Q Okay. Staying on page 3, after the at least</p> <p>15 15 adult men, the next sentence is "Once at the United</p> <p>16 Inn & Suites, five adult men purchased sex with</p> <p>17 plaintiff and the other minor with whom plaintiff was</p> <p>18 sex trafficked. The five adult men had sex with both</p> <p>19 minor simultaneously. A fight ensued which spilled</p> <p>20 out into the United Inn & Suites open air hallway and</p> <p>21 caused significant commotion." And going to the next</p> <p>22 page, "Plaintiff threatened to pepper spray the men,"</p> <p>23 and I'm going to stop there, because I don't want to</p> <p>24 get to the next event. Was it you or G.W. who</p> <p>25 threatened to pepper spray?</p>	<p style="text-align: right;">Page 136</p> <p>1 sex trafficked. The five adult men had sex with both</p> <p>2 minor victims simultaneously. After the five adult</p> <p>3 men left plaintiff's room, the men stood in the open-</p> <p>4 air hallway banging on the door and demanding the</p> <p>5 minors allow them back into the room." End of</p> <p>6 sentence.</p> <p>7 Fair to say that this is describing the</p> <p>8 Hispanic --</p> <p>9 A Yes, and the other one.</p> <p>10 Q Got you. Do you know what -- who's name</p> <p>11 room 112 was rented for in United Inn that weekend?</p> <p>12 A I don't know his real name. I just know</p> <p>13 that it was Doc who rented out the room.</p> <p>14 Q Okay. And did you ever -- one of these days</p> <p>15 I'm going to remember. Was it Swayzii?</p> <p>16 A Swayzii.</p> <p>17 Q Did you ever see Swayzii after that initial</p> <p>18 meeting?</p> <p>19 A No.</p> <p>20 Q The last sentence starts on page 4 and goes</p> <p>21 to page 5. It says, "Some of plaintiff's traffickers</p> <p>22 were physically violent towards plaintiff and/or women</p> <p>23 in front of plaintiff." End of sentence. You told</p> <p>24 me, Ms. A.G., about the time that P.D. was I think</p> <p>25 you -- the words you used were physically -- or</p>
<p style="text-align: right;">Page 135</p> <p>1 A G.W.</p> <p>2 Q Okay. Was that the -- I'm just going to</p> <p>3 keep real general of how we're referring to these</p> <p>4 people. Was that the group of the Mexican men?</p> <p>5 A Well, she threatened pepper spray both of</p> <p>6 them and there was a argument with both of them. So</p> <p>7 I'm not sure which one is which 'cause they both kind</p> <p>8 of had the same incidents of what happened. But</p> <p>9 the -- the Hispanic men, they were kind of more</p> <p>10 outside beating on the door. The African men, we</p> <p>11 were, like, yelling back and forth with the door open.</p> <p>12 Q Which group was the shoes? That forgot</p> <p>13 their shoes inside?</p> <p>14 A The Hispanic men.</p> <p>15 Q If you had to say which one was a louder</p> <p>16 commotion, would it have been the Hispanic men or the</p> <p>17 other group of men if you know?</p> <p>18 A I would say it would be kind of equal. Just</p> <p>19 different commotion.</p> <p>20 Q Right. All right. Going to page 4, are you</p> <p>21 on page 4?</p> <p>22 A Yes.</p> <p>23 Q The next sentence says "Another time at the</p> <p>24 United Inn & Suites, five adult men purchased sex with</p> <p>25 plaintiff and the other minor with whom plaintiff was</p>	<p style="text-align: right;">Page 137</p> <p>1 aggressive with you about the heels. In that time,</p> <p>2 did he put his hands on you?</p> <p>3 A He did not put his hands on me. He just got</p> <p>4 in my face, like really close to my face and was</p> <p>5 screaming.</p> <p>6 Q Did you see him put his hands on any other</p> <p>7 women?</p> <p>8 A No.</p> <p>9 Q Were there any other instances where you</p> <p>10 felt intimidated or physically threatened by him?</p> <p>11 A The whole time -- it was just the fact that</p> <p>12 I know that he had a gun on him and, you know, we're</p> <p>13 out here by ourselves with no weapons, nobody out</p> <p>14 there, no money, no car. So it was kind of more a</p> <p>15 fear that we were in his hands, and we had to do what</p> <p>16 he said.</p> <p>17 Q How do you know he had a gun?</p> <p>18 A We saw it.</p> <p>19 Q When did you see the gun?</p> <p>20 A When we were in his car, when we came from</p> <p>21 the first hotel to United Inn, and then he kept it on</p> <p>22 him.</p> <p>23 Q Did you ever see anyone at United Inn &</p> <p>24 Suites with a gun?</p> <p>25 A Besides him?</p>

A.G. v. Northbrook Industries

<p style="text-align: right;">Page 138</p> <p>1 Q Yes, ma'am.</p> <p>2 A Doc also had a gun, but besides them two,</p> <p>3 no.</p> <p>4 Q And, Ms. A.G., before I ask you this</p> <p>5 question, I just want to reiterate that there's been a</p> <p>6 protective order entered in this case. So this</p> <p>7 transcript is not public record. It's going to be</p> <p>8 under seal. So I don't want you to be fearful of</p> <p>9 giving me a truthful answer. And if you are fearful</p> <p>10 just tell me and we can deal with that later.</p> <p>11 But this next sentence on page 5 says,</p> <p>12 "Plaintiff's suspects her traffickers were affiliated</p> <p>13 with criminal gangs." Can you tell me what</p> <p>14 information or knowledge or evidence you have that</p> <p>15 would suggest that your traffickers were affiliated</p> <p>16 with criminal gangs?</p> <p>17 A It was the way that he came off. And he</p> <p>18 talked about that it was a business and he would talk</p> <p>19 about how he had other people involved and the fact</p> <p>20 that he carried around guns, and you know, was</p> <p>21 watching us all the time. It felt like there was no</p> <p>22 way that he could be doing this all by himself.</p> <p>23 Q And by he, you mean P.D.?</p> <p>24 A Yes.</p> <p>25 Q Do you remember ever a time and -- I mean,</p>	<p style="text-align: right;">Page 140</p> <p>1 back there and then walked back up to the front with</p> <p>2 him. And then there was another time that we were</p> <p>3 just walking around the whole entire parking lot.</p> <p>4 There might have been more than that, but those are</p> <p>5 the two times that I know for sure that we were in the</p> <p>6 back parking lot.</p> <p>7 Q The times that I've been out to United Inn</p> <p>8 were much later than when all of this was going on.</p> <p>9 And it was -- the back parking lot was like -- beyond</p> <p>10 it was sort of heavily under construction. Do you</p> <p>11 remember what was behind the back parking lot back in</p> <p>12 2017? Was it just woods?</p> <p>13 A I think it was just woods.</p> <p>14 Q And then did you also -- would you also</p> <p>15 spend time from June 23rd to June 26th of 2017 in the</p> <p>16 front parking lot of the United Inn?</p> <p>17 A Yes.</p> <p>18 Q And tell me about that.</p> <p>19 A Well, we would spend time, like -- we would</p> <p>20 have, you know, these men driving up into the parking</p> <p>21 lot, having conversations. And us, you know, leaning</p> <p>22 into their car with little clothing on talking to</p> <p>23 them, hanging out having conversation. And we would</p> <p>24 also just stand around waiting for people to see us in</p> <p>25 the parking lot.</p>
<p style="text-align: right;">Page 139</p> <p>1 the classic example that I use Crips or Bloods, you</p> <p>2 know, do you ever remember hearing any kind of gang</p> <p>3 affiliation statement made either by P.D. or any of</p> <p>4 his associates?</p> <p>5 A No, but when him and Doc would talk, you</p> <p>6 could tell that they had their own way of speaking to</p> <p>7 each other. Like, secret words and stuff like that.</p> <p>8 I don't remember exactly, but at the time I could tell</p> <p>9 that they were talking so that we couldn't understand</p> <p>10 what they were saying.</p> <p>11 Q Okay. The next paragraph on page 5, the</p> <p>12 first sentence says "During the period at issue,</p> <p>13 plaintiff was regularly in common areas of the United</p> <p>14 Inn & Suites. Examples include parking lots,</p> <p>15 stairwells, breezeways, hallways, lobby, vending</p> <p>16 machine area, and sidewalks."</p> <p>17 So between from June 23rd to June 26th of</p> <p>18 2017, were you ever in the back parking lot at United</p> <p>19 Inn?</p> <p>20 A Yes.</p> <p>21 Q And tell me about the times that you were in</p> <p>22 the back parking lot.</p> <p>23 A We only probably went back there, like,</p> <p>24 twice. There was the one time when the guy -- the</p> <p>25 construction guy had parked back there. And we walked</p>	<p style="text-align: right;">Page 141</p> <p>1 And then, like, on the sidewalk in front of</p> <p>2 the parking lot. But most of the time we were in the</p> <p>3 parking lot because we weren't really trying to walk</p> <p>4 around as much. We were just trying to stay put and</p> <p>5 let people come to us.</p> <p>6 Q Were there ever times that you can recall</p> <p>7 specifically that you were hanging out in the</p> <p>8 stairwells of the United Inn?</p> <p>9 A Yeah, there -- that's actually on the right</p> <p>10 side. So if you're looking at it from the street, on</p> <p>11 the right side there's a stairwell I think that we</p> <p>12 were hanging out in, like, sitting over there, just</p> <p>13 talking. Sitting on the stairs. And then also in the</p> <p>14 middle where the front desk is, we were hanging out</p> <p>15 over there a little bit. 'Cause over there is where</p> <p>16 the vending machines were. I couldn't remember if</p> <p>17 there are stairs over there or not.</p> <p>18 Q And I know we were talking about where those</p> <p>19 vending machines are. And the next word is</p> <p>20 breezeways. And I know where the vending machines</p> <p>21 are, like, if you're facing the hotel, they're to the</p> <p>22 right of the lobby, correct?</p> <p>23 A Yes.</p> <p>24 Q Are there any other breezeways though other</p> <p>25 than that one right there?</p>

A.G. v. Northbrook Industries

<p style="text-align: right;">Page 142</p> <p>1 A No, like, a breezeway is like to walk 2 through from front to back? 3 Q Yes, ma'am. 4 A No. 5 Q And what would y'all do in the breezeways? 6 A Well, when we would go over there to get 7 snacks. And then when we were standing over there 8 waiting to get the -- to talk to them about getting 9 locked out of the room and when we went over there to 10 buy condoms. Like, I know we were over there for a 11 while kind of standing, talking. 12 Q Okay. And for the sidewalks, just so I'm 13 clear, you're talking about the sidewalk that's in 14 front of the front parking lot at United Inn that 15 borders Memorial Drive? 16 A Yes, that one and then also the like 17 sidewalk in front of the rooms. Kind of like sitting 18 there on the sidewalk that like leads to the parking 19 lot. 20 Q Understood. And for that sidewalk, if you 21 continued to walk away from the United Inn, would you 22 walk from the sidewalk you're talking about into the 23 front the parking lot? 24 A Yes. 25 Q Okay. The next sentence says, "During those</p>	<p style="text-align: right;">Page 144</p> <p>1 it says, "Plaintiff talked with United Inn & Suites 2 staff about various issues including but not limited 3 to purchasing condoms, being locked out of the room in 4 which she was trafficked and needing to be let back 5 in, and housekeeping services." End of sentence. 6 We've talked about all of those today; correct? 7 A Yes. 8 Q Then the next sentence says, "During many of 9 plaintiff's conversations with hotel staff, Plaintiff 10 G.W. was with plaintiff." 11 A Yes. 12 Q So when I read that, my -- the question I 13 have is was there a conversation you had with an 14 employee or staff member of the United Inn when G.W. 15 was not present? 16 A No. 17 Q Okay. It goes on to say with respect to 18 your interactions with front desk staff specifically, 19 "Plaintiff recalls interacting with at least an Indian 20 man." Do you agree with me, Ms. A.G., you've done 21 your best to describe what that Indian man looked 22 like? 23 A Yes. 24 Q If you can go to page 9. And this is just 25 in response to we're asking you to identify the United</p>
<p style="text-align: right;">Page 143</p> <p>1 periods plaintiff was frequently around and observed 2 by hotel employees working at the hotel." 3 Ms. A.G., other than the -- so we've talked 4 about the interactions that you can recall, is there 5 anybody else you can remember that you were observed 6 by that you thought was an employee or staff member of 7 the United Inn? 8 A We saw like other cleaning people that was 9 walking around and stuff. But we never interacted 10 with them, like, talked to them besides one lady. 11 Q And that was to get towels? 12 A Yes. 13 Q Did y'all -- did the maids ever come and 14 clean that room? 15 A No. 16 Q And is that on instruction of P.D.? 17 A Yes. 18 Q All right. Ms. A.G., if you can go to 19 page 6 real quick. And you just want to show you what 20 this response is to. We're not going to really look 21 at this page, but basically, we asked to provide a 22 narrative and factual basis for the allegation that 23 United Inn had ample opportunity to observe the age 24 and appearance of you and G.W. and I want to go to 25 page 7. That first full paragraph, it -- the middle</p>	<p style="text-align: right;">Page 145</p> <p>1 Inn & Suites employee that had a conversation with any 2 of traffickers. And on page 9, it says in the third 3 line down "After arriving at the hotel, Doc went into 4 the hotel lobby to reserve a room for Plaintiff G.W. 5 and Plaintiff A.G. It is believed it had that doc 6 reserved one of the following rooms or a room nearby: 7 117, 118, 119, 120. Plaintiff does not recall the 8 name of the front desk clerk with whom he interacted. 9 She believes she interacted with at least an Indian 10 man working at the front desk." My question is, you 11 don't know who Doc interacted with in that lobby; 12 correct? 13 A Correct. 14 Q Going to that next paragraph, I'll just read 15 it for the record to keep it clean. "In the days 16 after Doc reserved the room described in the forgoing 17 paragraph, Plaintiff G.W. and Plaintiff A.G. were 18 locked out of their room. They had misplaced the room 19 key that Zaccheus Obie and Doc gave them. Plaintiff 20 G.W. and Plaintiff A.G. went to the front desk to ask 21 for help. They reported that they were locked out of 22 a hotel room rented to someone else. Plaintiff G.W.'s 23 and Plaintiff A.G.'s respective names were not on the 24 reservation. They were minors at the time. The front 25 desk clerk did not ask for any further information</p>

A.G. v. Northbrook Industries

<p style="text-align: right;">Page 146</p> <p>1 from them. Examples given ID, age, reason for being 2 at the hotel, whereabouts of person whose name was on 3 the room reservation, their relationship to person 4 whose on name was on the room reservation or anything 5 else. Instead, the front desk clerk picked up the 6 phone and called Doc or Zaccheus Obie. After doing 7 so, the front desk clerk walked Plaintiff G.W. and 8 Plaintiff A.G. to the room in which they were being 9 sex trafficked at the United Inn & Suites. Plaintiff 10 does not recall the name of the front desk clerk with 11 whom she interacted. She believes she interacted with 12 at least an Indian man working at the front desk." 13 I know that ended on page 10, but going back 14 to page 9, you don't remember whether or not the front 15 desk clerk called P.D. or Doc? Or on the other hand 16 if P.D. or Doc called the front desk; is that 17 accurate? 18 A Right. 19 Q And is it fair to say that the front desk 20 clerk did not give you a key when you walked in and 21 said, we're not on the reservation, we left our key in 22 the room? 23 A Yes. 24 Q And ultimately, he said we have to get 25 confirmation from the person whose name is on the</p>	<p style="text-align: right;">Page 148</p> <p>1 out the damages that you believe you've suffered as a 2 result of this incident in June of 2017; okay? 3 A Okay. 4 Q And some of these, I'll be honest with you, 5 they're legal terms so I'm not going to ask you about 6 every specific one. But I do have a few questions. 7 Did you ever seek medical treatment as a result of the 8 events from June 23rd to 26th of 2017? 9 A I did do counseling. 10 Q Where did you do counseling? 11 A I did it through Pat, it was called ML 12 health. 13 THE REPORTER: I'm sorry, did you say 14 Pat? 15 THE WITNESS: Pat. 16 THE REPORTER: Okay. Thank you. 17 BY MR. STORY: 18 Q And what does Pat stand for? 19 A Pat was one of my attorneys. 20 Q Oh, is it McDonough? It's okay. Strike 21 that. 22 A I'm not sure. 23 Q And just to let you know, you can tell me 24 who -- but I don't need to know the contents of 25 anything you spoke with -- spoke about with your</p>
<p style="text-align: right;">Page 147</p> <p>1 room; correct? 2 A Yes. 3 Q I've asked you a few times about specific 4 nights, but I just want to ask you generally, while 5 you were at the United Inn & Suites from June 23rd to 6 when you left the morning of June 26th, do you have a 7 specific recollection of any outfits that you wore? 8 A I know the whole time we were wearing very 9 scandalous outfits, but I don't remember exactly which 10 outfits, what days. It was definitely things we did 11 not need to be wearing. 12 Q I think you had said earlier, all the 13 clothes that you were wearing were your clothes; is 14 that correct? 15 A Yes, or clothes that I got from friends back 16 at home or from my cousin. 17 Q So you -- did you go shopping before y'all 18 went down to Atlanta to get clothes to do this? 19 A No. 20 Q Is it fair to say that the outfits you were 21 wearing the weekend of June 23rd to 26th of 2017 you 22 had worn before? 23 A Yes. 24 Q I want to go to page 16, and this is a 25 response to -- we asked for you to itemize, to list</p>	<p style="text-align: right;">Page 149</p> <p>1 attorneys. 2 A Okay. 3 Q So where's ML health? 4 A I did it online. 5 Q And tell me about that program? 6 A I spoke to her once a week. And I probably 7 did that for a month, maybe two months. 8 Q Do you think it was helpful? 9 A It was. I would have liked to continue with 10 doing -- having that help. 11 Q Why did you stop? 12 A Because after so many sessions, you had to 13 start paying for it and I didn't have the money to pay 14 for it anymore -- or at all. 'Cause it was covered I 15 guess by my lawyers or like, something. And then 16 after that, you -- after so many sessions, you had to 17 pay. And I didn't have the money to pay for that, so 18 I didn't do it anymore. 19 Q Do you have insurance through FedEx? 20 A No. 21 Q So as you sit here today, do you not have 22 health insurance? 23 A I have -- I have Medicaid -- whichever one. 24 I'm not sure which one it is. I do have that through 25 my son.</p>

A.G. v. Northbrook Industries

<p style="text-align: right;">Page 178</p> <p>1 prostitution.</p> <p>2 Q Did you just think he had girls that would</p> <p>3 strip?</p> <p>4 A Yes.</p> <p>5 Q You can turn to the next page. I'm going to</p> <p>6 ask you about -- and I'm going to read it out loud,</p> <p>7 but I want to make sure that you can read it with me.</p> <p>8 It's a car came do pick up G.; do you see that</p> <p>9 paragraph?</p> <p>10 A Yes.</p> <p>11 Q Okay. I'm going to read it out loud for the</p> <p>12 record and ask you a few questions.</p> <p>13 "A car came to pick up G. and W. at G.'s</p> <p>14 house and was driven by a black female. Swayzii had</p> <p>15 told G. and W. that he would find other things they</p> <p>16 could do for money before they turned 18. So they</p> <p>17 asked the female driver what the other things were</p> <p>18 that they would be doing. The woman told them they</p> <p>19 would be having sex for money if they wanted to. She</p> <p>20 told them that she used to do the same thing for</p> <p>21 money. When G. and W. got into the car with the</p> <p>22 woman, they had to give her the \$100 that Swayzii had</p> <p>23 initially asked for in their first meeting." End of</p> <p>24 paragraph.</p> <p>25 So, Ms. A.G. is it fair to say that the</p>	<p style="text-align: right;">Page 180</p> <p>1 At what point, Ms. A.G., did you understand</p> <p>2 what the phrase make plays meant?</p> <p>3 A I think after we had been walking around for</p> <p>4 a while and we had a couple cars stop and they were</p> <p>5 saying, you know, that they wanted sex for money, and</p> <p>6 we said that that was not what we were looking to do.</p> <p>7 And we told P Diddy that and he was like, well, that's</p> <p>8 what I need y'all to do to be able to make some money.</p> <p>9 Q And so that was that first night on</p> <p>10 June 22nd?</p> <p>11 A Yes.</p> <p>12 Q And you ultimately figured that out from</p> <p>13 talking to P.D. about the offers that you were</p> <p>14 receiving?</p> <p>15 A Yes.</p> <p>16 Q I'm not going to read this whole paragraph,</p> <p>17 but see the bottom at 9325 it says, "the male took G.</p> <p>18 and W. to a gas station to get money and then the</p> <p>19 three of them returned to G. and W.'s hotel room at</p> <p>20 the Red Roof Inn near Industrial Boulevard." See that</p> <p>21 sentence?</p> <p>22 A Where?</p> <p>23 Q It's the very bottom of 9325, starts with</p> <p>24 the male took?</p> <p>25 A The male -- I see the male indicated.</p>
<p style="text-align: right;">Page 179</p> <p>1 black female that gave you a ride to Atlanta on</p> <p>2 June 22, 2017, told you that you'd be having sex for</p> <p>3 money?</p> <p>4 A No.</p> <p>5 Q Did she mention that it was an option?</p> <p>6 A She talked about that she used to do it and</p> <p>7 that some of the girls would do it. But she never</p> <p>8 said that is what we would be doing.</p> <p>9 Q Okay.</p> <p>10 A Because we had told her, we came down here</p> <p>11 on assumptions that we were just going to be dancing</p> <p>12 and she was saying that -- if that's what we assumed</p> <p>13 then that is what it probably was.</p> <p>14 Q I'm going to read the next paragraph out</p> <p>15 loud and ask you a few questions.</p> <p>16 "The female driver drove G. and W. to a</p> <p>17 hotel in a rough looking area near a lot of truckers.</p> <p>18 When they got to the hotel, they called Swayzii's</p> <p>19 brother again and he told them to walk the street and</p> <p>20 'make plays'. To make plays was to have sex for</p> <p>21 money. He didn't tell them how much money to charge</p> <p>22 at first, but later set a \$500 per night quota on each</p> <p>23 of the girls. They did not reach \$500, he told them</p> <p>24 he was disappointed in them, but he did not get too</p> <p>25 mad." End of paragraph.</p>	<p style="text-align: right;">Page 181</p> <p>1 Q Are you on 9325?</p> <p>2 A Yes. Oh, okay. Okay. I see.</p> <p>3 Q Seeing that sentence and understanding that</p> <p>4 we're going over a summary of the forensic interview</p> <p>5 of you from August 4, 2017, would it be accurate to</p> <p>6 say that on the night of June 22, 2017, the hotel that</p> <p>7 you and G.W. were staying at was the Red Roof Inn near</p> <p>8 Industrial Boulevard?</p> <p>9 A I'm not sure if it was the Red Roof.</p> <p>10 Q Okay. Did you ever have unprotected sex</p> <p>11 during June of 2017?</p> <p>12 A No.</p> <p>13 Q Did you during June of 2017 go by a nickname</p> <p>14 of Cloud?</p> <p>15 A I think that was a name that like, I came up</p> <p>16 for myself. But then P Diddy came up with Light</p> <p>17 Bright and that's what I ended up going by.</p> <p>18 Q Got you. If I say there's a girl named</p> <p>19 Shay, do you know who Shay is?</p> <p>20 A No.</p> <p>21 Q Did the school resource officer at Commerce</p> <p>22 high school ever touch you inappropriately?</p> <p>23 A No.</p> <p>24 Q Never?</p> <p>25 A No. There were other issues with him. Of</p>

A.G. v. Northbrook Industries

Page 198	Page 200
<p>1 Q And do you believe as a result of what</p> <p>2 happened to you from June 22nd until June 26th of 2017</p> <p>3 that you suffered injuries?</p> <p>4 A Yes.</p> <p>5 Q And you believe in part that United Inn is</p> <p>6 as to blame for those injuries; is that fair?</p> <p>7 A Yes.</p> <p>8 Q Do you believe P.D. has any responsibility</p> <p>9 to blame for your injuries?</p> <p>10 A Yes.</p> <p>11 Q More or less than United Inn?</p> <p>12 A Equal.</p> <p>13 Q Do you believe that Doc -- that there's any</p> <p>14 blame or fault towards Doc for the injuries you</p> <p>15 suffered?</p> <p>16 A Yes.</p> <p>17 Q More or less than the United Inn?</p> <p>18 A Equal.</p> <p>19 Q What about the girl who drove you? Do you</p> <p>20 believe that she's to blame at all for any of this?</p> <p>21 A Yes.</p> <p>22 Q More or less than United Inn?</p> <p>23 A Equal.</p> <p>24 Q And then I'm going to ask you that same</p> <p>25 question about the -- and I know that we don't know</p>	<p>1 A Yes.</p> <p>2 Q You described two groups of men who came to</p> <p>3 the United Inn & Suites on the night of Saturday,</p> <p>4 June 24, 2017, and into the early morning hours of</p> <p>5 Sunday, June 25, 2017. Do you recall that?</p> <p>6 A Yes.</p> <p>7 Q Was one of those groups a group of Hispanic</p> <p>8 men?</p> <p>9 A Yes.</p> <p>10 Q Was one of those groups a group of black</p> <p>11 men?</p> <p>12 A Yes.</p> <p>13 Q Did you describe the black men as being</p> <p>14 Haitian or African looking? Or would you just</p> <p>15 describe them as a group of black men?</p> <p>16 A Like, Haitian men.</p> <p>17 Q What was your understanding of why these</p> <p>18 groups of men were coming to the United Inn & Suites</p> <p>19 to meet with you and Ms. G.W.?</p> <p>20 A To have sex for money.</p> <p>21 Q And did you understand that they were coming</p> <p>22 to the United Inn & Suites to have sex only with you</p> <p>23 A.G. or also with Plaintiff G.W.?</p> <p>24 A With both.</p> <p>25 Q Did these groups of men pay money to you and</p>
Page 199	Page 201
<p>1 the exact hotel on Fulton Industrial but to the extent</p> <p>2 that they're to blame for your injuries, do you think</p> <p>3 their fault is more or less than United Inn?</p> <p>4 A Equal.</p> <p>5 Q From June 22nd to June 26th of 2017, did you</p> <p>6 ever have any interaction with any form of a police</p> <p>7 officer?</p> <p>8 A No.</p> <p>9 MR. STORY: Ms. A.G., at this current</p> <p>10 time, I do not have any further questions for you.</p> <p>11 Thank you so much for your time today.</p> <p>12 THE WITNESS: You're welcome. Thank</p> <p>13 you.</p> <p>14 THE REPORTER: Sir?</p> <p>15 MR. BOUCHARD: I have a few questions,</p> <p>16 yes.</p> <p>17 EXAMINATION</p> <p>18 BY MR. BOUCHARD:</p> <p>19 Q Ms. A.G., did you personally observe</p> <p>20 Ms. G.W. have sex for money at the United Inn & Suites</p> <p>21 in June 2017?</p> <p>22 A Yes.</p> <p>23 Q With how many men?</p> <p>24 A I am not sure.</p> <p>25 Q More than one?</p>	<p>1 G.W. for sex?</p> <p>2 A Yes.</p> <p>3 Q Did you personally have sex with the group</p> <p>4 of Hispanic men?</p> <p>5 A Yes.</p> <p>6 Q At the United Inn & Suites?</p> <p>7 A Yes.</p> <p>8 Q Where did you have sex with the group of</p> <p>9 Hispanic men?</p> <p>10 A On the bed.</p> <p>11 Q In what room?</p> <p>12 A Room 112.</p> <p>13 Q Where was G.W. when you were having sex with</p> <p>14 the group of Hispanic men?</p> <p>15 A At the bottom of the bed.</p> <p>16 Q During the time that you were having sex</p> <p>17 with members of this group of Hispanic men, could you</p> <p>18 see at all times what Plaintiff G.W. was doing?</p> <p>19 A No.</p> <p>20 Q Do you know if the Hispanic men touched G.W.</p> <p>21 in a sexual way in exchange for the money that they</p> <p>22 paid?</p> <p>23 A No.</p> <p>24 Q Do you know if Plaintiff G.W. was engaged in</p> <p>25 any sexual acts with these Hispanic men in the</p>

A.G. v. Northbrook Industries

<p style="text-align: right;">Page 202</p> <p>1 exchange for the money they paid?</p> <p>2 A I'm not sure.</p> <p>3 Q Do you know how many of the Hispanic men may</p> <p>4 have engaged in sexual acts with G.W. while you were</p> <p>5 engaged in sex acts with other of the Hispanic men?</p> <p>6 A I'm not sure.</p> <p>7 Q And you would agree with me that obviously</p> <p>8 you were not having sex with all the members of the</p> <p>9 group of Hispanic men at the same time?</p> <p>10 A Correct.</p> <p>11 Q In other words, you might be, at any given</p> <p>12 point in time engaged in a sex act with some number of</p> <p>13 the group, but there would be other members of the</p> <p>14 group who were not involved in a sex act with you</p> <p>15 personally?</p> <p>16 A Correct.</p> <p>17 Q And you don't know what those members were</p> <p>18 doing at that time with G.W.</p> <p>19 A Correct.</p> <p>20 Q I want to talk to you about the other group</p> <p>21 of men that -- the black men who I think you've</p> <p>22 described as maybe being Haitian; is that right?</p> <p>23 A Yes.</p> <p>24 Q Where did you have sex with that group of</p> <p>25 men? Was that also at the United Inn & Suites?</p>	<p style="text-align: right;">Page 204</p> <p>1 Q Do you know if other members of that group</p> <p>2 of men engaged in any other sexual acts with her, for</p> <p>3 example, oral sex?</p> <p>4 A I'm not sure.</p> <p>5 Q Do you know how many total members of that</p> <p>6 group engaged in any kind of sex act with Plaintiff</p> <p>7 G.W.?</p> <p>8 A No.</p> <p>9 Q What was your understanding of why this</p> <p>10 group of black or Haitian men had paid you and G.W.</p> <p>11 money?</p> <p>12 A For sex.</p> <p>13 Q And did you understand that they were paying</p> <p>14 you only for sex or both of you?</p> <p>15 A Both of us.</p> <p>16 Q Thanks.</p> <p>17 MR. BOUCHARD: Nothing further at this</p> <p>18 time.</p> <p>19 THE REPORTER: Any follow-up?</p> <p>20 MR. STORY: Just one.</p> <p>21 EXAMINATION</p> <p>22 BY MR. STORY:</p> <p>23 Q What's the difference between a Haitian man</p> <p>24 and a black man?</p> <p>25 A They just had an accent, you could tell</p>
<p style="text-align: right;">Page 203</p> <p>1 A Yes.</p> <p>2 Q In the same room, 112?</p> <p>3 A Yes.</p> <p>4 Q Where was G.W. when you had sex with that</p> <p>5 group of men?</p> <p>6 A In the bathroom.</p> <p>7 Q During the time that you had sex with those</p> <p>8 men, where were you?</p> <p>9 A On the bed.</p> <p>10 Q Were you ever in bathroom with G.W.?</p> <p>11 A No.</p> <p>12 Q Okay. So during the time that you were on</p> <p>13 the bed having sex with some members of this group of</p> <p>14 black men or Haitian men, did you know exactly what</p> <p>15 Plaintiff G.W. was doing in the bathroom?</p> <p>16 A No.</p> <p>17 Q Do you know if this group of black men</p> <p>18 touched Plaintiff G.W. in a sexual way in the</p> <p>19 bathroom?</p> <p>20 A We had talked about it afterwards and she</p> <p>21 did say that -- that she had sex with one of the guys</p> <p>22 while in there.</p> <p>23 Q Do you know if other members of the group</p> <p>24 touched her sexually?</p> <p>25 A I'm not sure.</p>	<p style="text-align: right;">Page 205</p> <p>1 that -- I don't really know the difference, but I just</p> <p>2 know that they did not have an American accent.</p> <p>3 Q Okay. Because I never heard you describe</p> <p>4 them as Haitian until your attorney was asking you if</p> <p>5 you described them as Haitian and you said yes. So</p> <p>6 the basis for you saying that is because they just did</p> <p>7 not have an American accent?</p> <p>8 A Yes.</p> <p>9 MR. STORY: Okay. I don't have any</p> <p>10 other questions.</p> <p>11 THE REPORTER: Any more?</p> <p>12 MR. BOUCHARD: No, sir.</p> <p>13 THE REPORTER: This concludes the</p> <p>14 testimony. State rules provide the witness shall be</p> <p>15 afforded the opportunity to review the transcript. If</p> <p>16 parties wish to waive, please state so. Counsel for</p> <p>17 the plaintiff, I understand earlier you said you</p> <p>18 wanted to read and sign. Is that still the case?</p> <p>19 MR. BOUCHARD: That's correct.</p> <p>20 THE REPORTER: And did you want a</p> <p>21 transcript as well?</p> <p>22 MR. BOUCHARD: Yeah, but just an</p> <p>23 electronic copy, please. Thank you.</p> <p>24 THE REPORTER: Okay. Counsel for the</p> <p>25 defense, did you want a transcript?</p>